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Exelon Nuclear

RS-01-017

February 2, 2001

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Draft Safety Evaluations for the Conversion to Improved Standard Technical Specifications

References: (1) Letter from R. M. Krich (ComEd) to U. S. NRC Document Control Desk, "Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Convert to Improved Standard Technical Specifications," dated March 3, 2000

(2) Letter from S. N. Bailey (U. S. NRC) to O. D. Kingsley, "Draft Safety Evaluations for the Conversion to Improved Standard Technical Specifications for Dresden Nuclear Power Station Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2," dated January 19, 2001

Commonwealth Edison (ComEd) Company, currently Exelon Generation Company (EGC), in a letter dated March 3, 2000 (Reference 1) proposed changes to the Technical Specifications (TS) of Facility Operating License Nos. DPR-19, DPR-25, NPF-11, NPF-18, DPR-29, and DPR-30 for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2,

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and Quad Cities Nuclear Power Station, Units 1 and 2. The NRC issued the draft Safety Evaluations (SEs) supporting the conversion to the Improved Technical Specifications (Reference 2) and requested that comments be provided by February 2, 2001.

We have completed our review of the draft SEs and specific comments on the draft SEs are attached.

Should you have any questions concerning this letter, please contact Mr. J. V. Sipek at (630) 663-3741.

Respectfully,

R. M. Krich
Director-Licensing
Mid-West Regional Operating Group

Attachment: Comments on Draft Safety Evaluations

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

ATTACHMENT

Comments on Draft Safety Evaluations

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. ____ TO FACILITY OPERATING LICENSE NO. DPR-19

AND AMENDMENT NO. ____ TO FACILITY OPERATING LICENSE NO. DPR-25

EXELON GENERATION COMPANY, LLC

DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

DOCKET NOS. 50-237 AND 50-249

I. INTRODUCTION

Dresden Nuclear Power Station, Units 2 and 3 (Dresden), has been operating with Technical Specifications (TS), issued on June 28, 1996, that were developed during the Technical Specification Upgrade Program (TSUP), as amended from time to time. The TSUP was a partial adoption of the TS found in NUREG-0123, "Standard Technical Specifications General Electric Plants BWR/4," Revision 4. The TSUP was initiated as a result of findings by a Diagnostic Evaluation Team inspection performed at Dresden in 1987.

space

By letter dated March 3, 2000, Exelon Generation Company,LLC (EGC, or the licensee, formerly Commonwealth Edison Company), proposed to amend the operating licenses for Dresden to completely revise the TS with new TS based on the following:

- NUREG-1433, "Standard Technical Specifications - General Electric Plants, BWR/4" Revision 1, of April 1995.
- "NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), published on July 22, 1993 (58 FR 39132).
- The current Dresden TS.

The overall objective of EGC's request, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline TS consistent with 10 CFR 50.36.

Hereinafter, the proposed TS are referred to as the Improved TS (ITS), the existing Dresden TS are referred to as the Current TS (CTS), and the TS in NUREG-1433 are referred to as the Standard TS (STS). The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively.

EGC retained portions of the CTS in the ITS in addition to basing the ITS on the STS and the Final Policy Statement. The NRC discussed plant-specific issues, including design features, requirements, and operating practices with EGC during a series of conference calls and meetings. In addition, EGC proposed generic changes that were not in the STS. The NRC staff asked EGC to submit such generic issues as proposed changes to the STS through the Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues

ENCLOSURE 1

were considered for the Dresden ITS before evaluating them generically. EGC proposed transferring some CTS requirements to EGC-controlled documents as this was consistent with the Final Policy Statement. In addition, EGC used human factors principles to clarify CTS requirements being retained in the ITS and to define more clearly the appropriate scope of the ITS. Further, EGC proposed changes to the CTS Bases to make each ITS requirement clearer and easier to understand.

Since the licensee prepared the March 3, 2000, application, a number of amendments to the Dresden operating license were approved, as follows:

Amendment No. (Unit 2, Unit 3)	Description of Change	Issue Date
176 172	Revise Minimum Suppression Chamber Water Level	3/30/2000
177 173	Increase Surveillance Test Interval and Allowed Outage Time for Assorted Instrumentation	8/02/2000
178 --	Revise Expiration Date of Unit 2 Operating License	9/06/2000
179 174	Revise Pressure/Temperature Limits	9/19/2000
180 175	Revise Minimum Critical Power Ratio	9/21/2000
181 176	Remove Turbine EHC Low Pressure RPS Trip Function	9/27/2000
182 177	Increase Condensate Storage Tank Low Level Setpoint.	10/31/2000
183 178	Transfer of Operating License to EGC	1/12/2001
~~**no. no.**~~	~~Add Mechanical Vacuum Pump Isolation Function~~	~~**date**~~
no. no.	Reduce the Number of Safety Valves Required for Reactor Vessel Overpressure Protection	**date**

These amendments have been incorporated, as appropriate, into the ITS.

The March 3, 2000, application was supplemented by letters dated March 24, June 5, July 18, July 31, September 1, September 22, October 5, October 9, November 20, November 30, December 18, **date (revision D)**, and **date (license conditions)**. The NRC staff issued requests for additional information (RAIs) by letters dated June 21, July 3, August 18, August 31, September 12, and November 3, 2000.

In addition, the ITS conversion was supported by one other license amendment request, dated August 31, 2000, which the licensee identified as being required to implement the ITS. This request related to the surveillance requirements for the Emergency Diesel Generator. The August 31, 2000, applications provided additional supporting information for changes that had

already been incorporated into the March 3, 2000, application. The review of the August 31, 2000, application is included in this safety evaluation.

The NRC published its proposed actions on EGC's application for amendment of March 3, 2000, in the *Federal Register* on **date (citation)** and **date (citation)**. This Safety Evaluation (SE) assesses EGC's application and supplemental information that resulted from NRC requests for information and discussions with EGC during the NRC staff's review. All ITS changes are within the scope of the actions described in the *Federal Register* notices.

The NRC staff relied on the Final Policy Statement and the STS as guidance for reviewing proposed deviations from the STS. This SE provides the basis for the NRC staff's conclusions that 1) EGC developed the ITS based on the STS as modified by plant-specific changes, and 2) using the Dresden ITS is acceptable for continued plant operation. It is acceptable that the ITS differs from STS, since the ITS reflects Dresden's current licensing basis. The NRC staff approves EGC's changes to their CTS with modifications documented in their revised submittals.

For the reasons stated in this SE, the NRC staff finds that the TS issued with this license amendment comply with Section 182a of the Atomic Energy Act, 10 CFR 50.36, and the guidance in the Final Policy Statement and that the TS are in accord with the common defense and security and provide adequate protection of the health and safety of the public.

II. BACKGROUND

Section 182a of the Atomic Energy Act requires that applicants for nuclear power plant operating licenses will state:

> [S]uch technical specifications, including information of the amount, kind, and source of special nuclear material required, the place of the use, the specific characteristics of the facility, and such other information as the Commission may, by rule or regulation, deem necessary in order to enable it to find that the utilization . . . of special nuclear material will be in accord with the common defense and security and will provide adequate protection to the health and safety of the public. Such technical specifications shall be a part of any license issued.

In 10 CFR 50.36, the Commission established its regulatory requirements for TS content. In doing so, the Commission emphasized those matters related to preventing accidents and mitigating accident consequences. The Commission noted that applicants were expected to incorporate into their TS "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity" (see Statement of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports," of December 17, 1968 (33 FR 18610)).

10 CFR 50.36 requires that TS include items in the following five specific categories:

(1) safety limits, limiting safety system settings and limiting control settings
(2) limiting conditions for operation (LCOs)

(3) surveillance requirements (SRs)
(4) design features
(5) administrative controls

However, the rule does not specify particular TS requirements.

For several years, NRC and industry representatives have tried to develop guidelines for improving nuclear power plant TS content and quality. On February 6, 1987, the Commission issued their "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, the utility Owners Groups and the NRC staff developed improved STS for each primary reactor type that would comply with the Commission's policy. In addition, the NRC staff, licensees, and Owners Groups developed a Writers Guide containing generic administrative and editorial guidelines for preparing TS. The Guide emphasized human factors principles, and EGC used it to develop their ITS.

BWR/4

In September 1992, the Commission issued the General Electric STS as NUREG-1433, which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The General Electric STS are a model for developing ITS for General Electric plants. The results from applying the Interim Policy Statement criteria to generic system functions were published in a "Split Report" issued to the Nuclear Steam System Supplier (NSSS) Owners Groups in May 1988. The Interim Policy Statement criteria along with the Writer's Guide ensured that the ITS would consistently reflect system configurations and operating characteristics for all NSSS designs. In addition, the generic Bases provide a lot of information about the basis for the STS requirements.

On July 22, 1993, the Commission issued its Final Policy Statement indicating that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36 (58 FR 39132). The Final Policy Statement described the STS safety benefits and encouraged licensees to use the STS as the basis for plant-specific TS amendments and for complete conversions to the IST. Further, the Final Policy Statement gave guidance for evaluating the required scope of the ITS and defined the guidance criteria for determining which of the LCOs and associated surveillances should remain in the ITS. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the ITS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in Portland General Electric Company's hearing (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed the following:

ITS

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

Using this approach, licensees should keep in the ITS existing LCO requirements that fall within or satisfy any of the Final Policy Statement criteria. Those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36593, July 19, 1995). The Final Policy Statement criteria are as follows:

Criterion 1 — Installed instrumentation that is used to detect and indicate in the control room a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2 — A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to fission product barrier integrity.

Criterion 3 — A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to fission product barrier integrity.

Criterion 4 — A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Part III of this SE explains the NRC staff's conclusion that converting Dresden's CTS to those based on STS as modified by plant-specific changes is consistent with Dresden's current licensing basis and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

III. EVALUATION

The NRC staff's review evaluates changes to CTS that fall into categories, defined by EGC, and includes an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements removed from the CTS and placed in EGC-controlled documents.

The NRC staff's review of the March 3, 2000, submittal, as supplemented, identified the need for clarifications and additions to the submittal in order to establish an appropriate regulatory basis for translation of CTS requirements into ITS. Each change to the CTS proposed in the amendment request is identified as a discussion of change (DOC) to the CTS. EGC also provided justifications for deviation from the STS, as appropriate. The NRC staff comments were documented as requests for additional information (RAIs) and forwarded to EGC. EGC provided written responses to the NRC staff requests in supplemental letters indicated above. The docketed letters clarified and revised EGC's basis for translating CTS requirements into ITS. The NRC staff finds that EGC's submittals provide sufficient detail to allow the staff to reach a conclusion regarding the adequacy of EGC's proposed changes.

EGC's license amendment application categorized CTS changes as follows:

— Administrative Changes, (A), i.e., non-technical changes in existing CTS requirements.

— Technical Changes - More Restrictive, (M), i.e., new or additional CTS requirements.

— Technical Changes - Less Restrictive (specific), (L), i.e., deleting or relaxing CTS requirements.

— Technical Changes - Less Restrictive Relocated Requirements (generic), (LA), i.e., relocation of details out of the CTS and into licensee-controlled documents.

— Technical Changes - Less Restrictive (generic), (LB), i.e., extending an instrument completion time or surveillance frequency according to approved vendor topical reports (not used for Dresden).

relocation of

— Technical Changes - Less Restrictive, (LC), i.e., eliminating instrumentation requirements for alarm and indication only functions (not used for Dresden).
out of the CTS and into licensee-controlled documents

— Technical Changes - Less Restrictive, (LD), i.e., extending CTS surveillance intervals to 24 months from 18 months for items other than Channel Calibrations.

— Technical Changes - Less Restrictive, (LE), i.e., extending CTS surveillance intervals to 24 months from 18 months for Channel Calibrations.

— Technical Changes - Less Restrictive, (LF), i.e., use of revised methodologies for determining Allowable Values and instrument setpoints, and analyzing channel/instrument performance to ensure that the design basis and associated safety limits will not be exceeded during plant operation. due to the specification not meeting the criteria of 10 CFR 50.36

— Relocated Specifications, (R), i.e., relaxations in which whole specifications are removed from the CTS and placed in EGC-controlled documents.

The changes that are in the ITS conversion for Dresden are listed in the following tables attached to this SE:

- Table A of Administrative Changes to the CTS
- Table M of More-Restrictive Changes to the CTS
- Table L of Less-Restrictive Changes to the CTS (includes L, LD, LE, and LF categories)
- Table LA of Less-Restrictive, Relocated Requirements Changes to the CTS
- Table R of Relocated Specifications

The tables are only meant to summarize the changes being made to the CTS. The details, as to what the actual changes are and how they are being made to the CTS or ITS, are only provided in the licensee's application and supplemental letters.

The general categories of changes to the CTS requirements are described in more detail below.

A. Administrative Changes (A)

Administrative (non-technical) changes are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. Every section of the ITS reflects this type of change. In order to ensure consistency, the NRC staff and EGC have used STS as guidance to reformat and make other administrative changes. Among the changes proposed by EGC and found acceptable by the NRC staff are:

~~1 Providing the appropriate numbers, etc., for STS bracketed information (information that must be supplied on a plant-specific basis and that may change from plant to plant).~~

1 ~~2~~ Identifying plant-specific wording for system names, etc. {this is not part of CTS markups; it is in JFDs}

2 ~~3~~ Changing the wording of specification titles in the CTS to conform to STS.

3 ~~4~~ Splitting up requirements currently grouped under a single current specification to more appropriate locations in two or more specifications of ITS.

4 ~~5~~ Combining related requirements currently presented in separate specifications of the CTS into a single specification of ITS.

Table A lists the administrative changes proposed in ITS. Table A is organized by the corresponding ITS section DOC, and provides a summary description of the administrative change that was made, and CTS and ITS LCO references. The NRC staff reviewed all of the administrative and editorial changes proposed by EGC and finds them acceptable because they are compatible with the Writers Guide and STS, do not result in any substantive change in operating requirements, and are consistent with the Commission's regulations.

B. Technical Changes — More Restrictive (M)

EGC, in electing to implement the specifications of STS proposed a number of requirements more restrictive than those in the CTS. ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or have additional restrictions that are not in the CTS but are in the STS. Examples of more restrictive requirements are placing an LCO on plant equipment which is not required by the CTS to be operable, adopting more restrictive requirements to restore inoperable equipment, and adopting more restrictive SRs. Table M lists all the more restrictive changes proposed in ITS. Table M is organized by the corresponding ITS section DOC and provides a summary description of the more restrictive change that were adopted along with CTS and ITS LCO references. These changes are additional restrictions on plant operation that enhance safety. The staff reviewed these changes and found them to be acceptable.

5. Deletion of TS whose applicability has expired.
6. Presentation changes that involve rewording or reformatting for clarity but which do not involve a change in requirements.
7. Deletion of redundant TS requirements that exist elsewhere in the TS.
8. Wording changes and additions that are consistent with CTS interpretation and practice, and that more clearly or explicitly state existing requirements.

C. Technical Changes — Less Restrictive (L, LD, LE and LF)

L, LD, LE and LF technical changes are grouped here to simplify discussion of the broad range of proposed less restrictive changes in technical requirements. L is used to designate a CTS change that requires a unique discussion. LD, LE and LF are used to identify a recurring change evaluated by a single discussion in the submittal. Less restrictive requirements include deletions and relaxations to portions of CTS requirements that are not being retained in ITS or relocated to an EGC controlled document. When requirements have been shown to give little or no safety benefit, their relaxation or removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups' comments on STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The Dresden design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in the STS and thus provide a basis for ITS.

A significant number of changes to the CTS involved deletions and relaxations to portions of CTS requirements evaluated as Categories 1 through 10 that follow:

Category 1	— Relaxation of the LCO Requirements
Category 2	— Relaxation of Applicability
Category 3	— Relaxation of Surveillance Requirement
Category 4	— Relaxation of Required Action Detail
Category 5	— Relaxation of Required Actions to Exit Applicability
Category 6	— Relaxation of Completion Time
Category 7	— Allow Mode Changes When LCO Not Met
Category 8	— Elimination of Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
Category 9	— Elimination of CTS Reporting Requirement
Category 10	— Relaxation of Surveillance Frequency from 18 months to 24 months

The following discussions address why the various categories of changes are acceptable.

Category 1 - Relaxation of the LCO Requirements

Certain CTS LCOs contain operational and system parameters beyond those necessary to meet safety analysis assumptions and therefore are considered overly restrictive. CTS also contain limits which have been shown to give little or no safety benefit to the safe operation of the plant. The ITS, consistent with the guidance in the STS, delete or revise operating limits in this category. CTS LCO changes included in this category are: (1) revising setpoints to be consistent with instrument setpoint methodologies; (2) deleting or revising operational limits to establish requirements consistent with applicable safety analyses; (3) deleting equipment or systems which establish redundant system capability beyond that assumed to function by the applicable safety analyses or which are implicit to the ITS requirement for systems, components and devices to be operable; and (4) adding allowances to use administrative controls on plant devices and equipments during times when automatic control is required or to establish

temporary administrative limits, as appropriate, to allow time for systems to establish equilibrium operation.

TS changes represented by these categories of requirements allow operators to more clearly focus on issues important to safety. The resultant ITS LCOs maintain an adequate degree of protection consistent with the safety analysis. They also improve focus on issues important to safety and provide reasonable operational flexibility without adversely affecting the safe operation of the plant. These changes are consistent with STS and are acceptable.

Category 2 - Relaxation of Applicability

when fuel is in the reactor vessel

The CTS require compliance with the LCO during the Operational Mode(s) or other conditions specified in the LCO Applicability statement. Five Operating Modes are defined by TS according to average reactor coolant temperature, and the position of the reactor mode switch located in the control room: Power Operation, Startup, Hot Shutdown, Cold Shutdown and Refueling. When CTS Applicability requirements are inconsistent with the applicable accident analyses assumptions for a system, subsystem or component specified in the LCO, the LCO is changed in the ITS to establish a consistent set of requirements. These modifications or deletions are acceptable because, during the conditions referenced in the ITS, the operability requirements are consistent with the applicable safety analyses. These changes are consistent with STS and are acceptable.

, and reactor vessel head closure bolt tensioning

Category 3 - Relaxation of Surveillance Requirement

CTS require maintaining the LCO equipment operable by meeting the SRs in accordance with the specified SR Frequency. This requires conducting tests to demonstrate equipment is operable, or that LCO parameters are within specified limits. When the test acceptance criteria and any specified conditions for the conduct of the test are met, the equipment is deemed operable. The changes in this category relate to relaxation of CTS SR acceptance criteria and/or the conditions for performing the SR.

Relaxing the SR acceptance criteria for these items provides operational flexibility consistent with the objective of the STS without reducing confidence that the equipment is operable. The ITS also permits the use of an actual, as well as a simulated, actuation signal to satisfy SRs for automatically actuated systems. TS required features cannot distinguish between an "actual" signal and a "test" signal. The changes to TS acceptance criteria are acceptable because appropriate testing standards are retained for determining that the LCO-required features are operable.

Relaxing conditions for performing SRs include, for example, not requiring testing of de-energized equipment (e.g., instrumentation Channel Checks) or equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). The changes also include the allowance to verify the position of valves in high radiation areas by administrative means. ITS administrative controls (ITS 5.7) regarding access to high radiation areas make the likelihood of mispositioning valves small. These changes are acceptable because the changes do not affect the ability to determine whether equipment is capable of performing its intended safety function.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. These changes are consistent with STS and are acceptable.

Category 4 - Relaxation of Required Action Detail

LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO is not met, CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. In revising the Required Actions, details are deleted or options are added such that resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. Furthermore, adopting STS action requirements results in simpler, more concise and more direct action requirements. This allows more effective use of operator resources for placing and maintaining the reactor in a safe condition when the LCO is not met. These changes are consistent with STS and are acceptable.

Category 5 - Relaxation of Required Actions to exit Applicability

LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO is not met, CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. Compared to CTS required actions, the ITS actions result in extending the time period for taking the plant outside the applicability into shutdown conditions. For example, changes in this category include providing an option to: isolate a system, place equipment in the state assumed by the safety analysis, satisfy alternate criteria, take manual actions in place of automatic actions, "restore to operable status" within a specified time frame, place alternate equipment into service, or use more conservative TS setpoints. The resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. The ITS actions are commensurate with safety importance of the inoperable equipment, plant design and industry practice and do not compromise safe operation of the plant. These changes are consistent with STS and are acceptable.

Category 6 - Relaxation of Completion Time

Upon discovery of a failure to meet an LCO, TS specify times for completing Required Actions of the associated TS conditions. Required Actions establish remedial measures that must be taken within specified completion times (allowed outage times). These times define limits during which operation in a degraded condition is permitted.

Incorporating completion time extensions is acceptable because completion times take into account the operability status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, vendor-developed standard repair times, and the low probability of a design basis accident (DBA) occurring during the repair period. These changes are consistent with STS, and allowed outage time extensions specified as Category 6 are acceptable.

NRC { not needed - Also, you can be in Refuel MODE with the mode switch in Shutdown, per ITS Table 1.1-1

Category 7 - Allow Mode Changes When LCO Not Met

other

CTS 3.0.D (ITS 3.0.4) precludes entry into the applicable Mode or specified conditions while relying on the Actions, even though the Actions are designed to provide for safe operation of the plant. Unless otherwise stated, LCO 3.0.4 is always applicable to ITS LCO Actions. However, ITS adds a Note to certain Actions stating "LCO 3.0.4 is not applicable." The addition of this Note allows transition between Applicability Modes or other specified conditions with the LCO not met (i.e., relying on the Actions) even though the Actions may require plant shutdown. The addition of "LCO 3.0.4 is not applicable" notes does not impact normal operation of the plant for the specified LCO features and would not provide additional initiators for plant transients during the Mode or other specified conditions. This exception to ITS 3.0.4 is acceptable due to the passive function or the installed redundancy of the features, the plant conditions that apply to the Note, and the low probability of an event requiring the inoperable features. These changes are consistent with STS and are acceptable.

Category 8 - Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel

, among other requirements,

Some CTS LCOs and Actions specify "lock" the mode switch in "Shutdown" (~~shutdown position~~) or "Refuel" (~~refueling position~~). Other CTS Action requirements also specify placing the reactor in the shutdown or refueling Mode without requiring the mode switch to be "locked." The requirement to "lock" the mode switch in Shutdown or Refue~~ing~~ is not retained in the ITS. CTS Table 1-2, "Operational Modes" (ITS Table 1.1-1) defines reactor operational Modes based on the reactor mode switch position, and on average reactor coolant temperature. Moving a reactor mode switch from Shutdown or Refuel into a position other than Shutdown or Refuel may causes a Mode change as defined by TS, and results in associated TS compliance requirements for the LCOs that become applicable in the new Mode. CTS 3.0.~~X~~ D (ITS 3.0.4) precludes changes in reactor Modes without all TS required equipment operable. Thus, ITS 3.0.4 is an administrative requirement put in place to prevent movement of the reactor mode switch between positions without first ensuring TS required equipment is operable, and changing the mode switch from the required position is adequately controlled by ITS Table 1.1-1 without adding a requirement to "lock" the mode switch. These changes are consistent with the STS and are acceptable.

Category 9 - Elimination of CTS Reporting Requirement

CTS include requirements to submit special reports to the NRC when specified limits or conditions are not met. Typically, the time period for the report to be issued is "within 30 days." However, the ITS eliminates the TS requirements for special reports and instead relies on the reporting requirements of 10 CFR 50.73. The changes to the reporting requirements are acceptable because 10 CFR 50.73 provides adequate reporting requirements, and the special reports do not affect continued plant operation.

CTS also include requirements for reports to be made to the NRC on data gathered as part of routine plant programs. These requirements are removed from the ITS. The requirement to report test frequency changes that occur due to consecutive SR failures has been deleted since the test schedule is already covered by the TS. In addition, a historical review has shown the SR has never failed.

Deleting TS reporting requirements reduces unnecessary regulatory burden on the plant and allows licensee efforts to be concentrated on maintaining TS required limits. These changes are consistent with the STS and are acceptable.

Category 10 - Relaxation of Surveillance Frequency from 18 months to 24 months (LD, LE and LF)

CTS require maintaining the LCO equipment operable by conducting SRs in accordance with the specified SR Frequency. The changes in this category relate to extending SR frequencies. Improved reactor fuels allow the licensee to consider an increase in the duration of the fuel cycle for their facility. TS that specify an 18-month surveillance interval are changed to specify a 24-month interval. The CTS 4.0.B (ITS SR 3.0.2) provision to extend surveillances by 25 percent of the specified interval would extend the time limit for completing these surveillances from the CTS limit of 22.5 months to a maximum of 30 months. The staff review of these items is covered in more detail in Section G of this SE. These changes are consistent with the STS and are acceptable.

NRC < Need to somehow identify that this is end of Category 10 >

Table L includes all L, LD, LE, and LF changes and is organized by ITS section. The table specifies: the section designation; a summary description of the change; CTS and ITS LCO references; a reference to the specific change category as discussed above; and a characterization of the DOC.

For the reasons presented above, these less restrictive requirements are acceptable because they will not affect the safe operation of the plant. The ITS requirements are consistent with current licensing practices, operating experience, and plant accident and transient analyses, and provide reasonable assurance that public health and safety will be protected.

D. Technical Changes — Less Restrictive Relocated Requirements (Not Entire Specifications) (LA)

NRC < we use LA's to relocate entire specs that meet the criteria of 10 CFR 50.36 >

When requirements have been shown to give little or no safety benefit, their removal from the TS may be appropriate. These are grouped as LA changes. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments on STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The Dresden design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in the STS and thus provide a basis for ITS. A significant number of changes to the CTS involved the removal of specific requirements and detailed information from individual specifications evaluated to be Types 1 through 3 that follow:

Type 1 Details of System Design and System Description including Design Limits

Type 2 Descriptions of Systems Operation

Type 3 Procedural Details for Meeting TS Requirements, Reporting Requirements, and Specification Requirements

The following discussions address why each of the three types of information or requirements is not required to be included in ITS . (including the Technical Requirements Manual (TRM))

Type 1 Details of System Design and System Description Including Design Limits

The design of the facility is required to be described in the UFSAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings and maintained in accordance with an NRC-approved QA plan (UFSAR Chapter 17). In 10 CFR 50.59, controls are specified for changing the facility as described in the UFSAR, and in 10 CFR 50.54(a) criteria are specified for changing the QA plan. The ITS Bases also contain descriptions of system design. ITS 5.5.10 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately (including the TRM) controlled in the UFSAR, ~~controlled design documents and drawings,~~ or the ITS Bases, as appropriate. Cycle-specific design limits are contained in the Core Operating Limits Report (COLR). ITS Administrative Controls include the programmatic requirements for the COLR.

Type 2 Descriptions of Systems Operation

The plans for the normal and emergency operation of the facility are required to be described in the UFSAR by 10 CFR 50.34. ITS 5.4.1.a requires written procedures to be established, implemented, and maintained for plant operating procedures including procedures recommended in Regulatory Guide (RG) 1.33, Revision 2, Appendix A, February 1978. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the UFSAR. The ITS Bases also contain descriptions of system operation. It is acceptable to remove details of system operation from the TS because this type of information will be adequately controlled in the UFSAR, ~~plant operating procedures,~~ and the TS Bases, as appropriate.

(did not move anything to plant procedures)

Type 3 Procedural Details for Meeting TS Requirements, Reporting Requirements, and Specification Requirements

Details for performing TS Actions and SRs are more appropriately specified in the plant procedures required by ITS 5.4.1, the UFSAR, and ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in GL 91-04, allowing this procedural control is consistent with the vast majority of other SRs that do not dictate plant conditions for surveillances. Prescriptive procedural information in an Action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures is therefore required in any event. Other changes to procedural details include those associated with limits retained in the ITS. For example, the ITS requirement may refer to programmatic requirements such as COLR, included in ITS Section 5.6, which specifies the scope of the limits contained in the COLR and mandates NRC approval of the analytical methodology. (6)

NRC < needs to discuss process for ODCM, ISI Program and QA manual >

Relocating specification requirements, including LCO, required actions, and surveillance requirements, have been made in adopting the STS. For example, for certain power operated isolation valves that do not receive an automatic isolation signal and for which the closure time is not assumed in the safety analysis, requirements for periodic testing of these valves are moved to the procedures that implement the inservice testing program (10 CFR 50.55a). Support system specification requirements for other equipment with its own specifications are moved to the Technical Requirements Manual (TRM). The definition of operability provides sufficient assurance that the supporting system can perform its required support function.

(including the TRM)

The removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled in the UFSAR, ~~plant procedures~~ Bases, and COLR, as appropriate. This approach provides an effective level of regulatory control ~~and~~ provides for a more appropriate change control process. Similarly, movement of reporting requirements from LCOs to licensee-controlled documents is appropriate because ITS 5.6, 10 CFR 50.36 and 10 CFR 50.73 adequately cover the reports deemed to be necessary.

<Not in LA DOCs>

Table LA consists of LA changes. Table LA lists CTS specifications and describes the information that is removed from individual specifications and deleted or relocated to EGC-controlled documents. Table LA is organized by ITS section and includes the following: a DOC identification number referenced to ITS Section; a CTS reference; a summary description of the requirement; the document that retains the CTS requirements; and the specific change type, as discussed above.

The NRC staff has concluded that these types of detailed information and specific requirements are not necessary in the ITS to ensure the effectiveness of ITS to adequately protect the health and safety of the public. Accordingly, these requirements may be ~~deleted or~~ moved to one of the following EGC-controlled documents for which changes are adequately governed by a regulatory or TS requirement:

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(1) TS Bases controlled by ITS 5.5.14, "Technical Specifications Bases Control Program."
(2) UFSAR (includes the Technical Requirements Manual (TRM) by reference) controlled by 10 CFR 50.59.
(3) ODCM controlled by ITS 5.5.1, "Offsite Dose Calculation Manual."
(4) QA Manual controlled by 10 CFR 50.54.
(5) Inservice Testing Program controlled by ITS 5.5.6, "Inservice Testing Program," and 10CFR 50.55a.
(6) Inservice Inspection program controlled by 10 CFR 50.55a.
(7) Core Operating Limits Report controlled by ITS 5.6.5, "Core Operating Limits Report (COLR)."

To the extent that requirements and information have been relocated to EGC-controlled documents, such information and requirements are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, where such information and requirements are contained in LCOs and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria in the Final Policy Statement (discussed in Part II of this SE). Accordingly, existing detailed information and specific requirements, such as generally described above, may be deleted from the CTS.

E. Relocated Specifications (R)

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria may be relocated from CTS (an NRC-controlled document) to appropriate licensee-controlled documents. These requirements include the LCOs, Action Statements (Actions), and associated SRs. EGC proposed, in accordance with the criteria in the Final Policy Statement, to entirely remove certain TS from the CTS and place them in EGC-controlled documents. The staff has reviewed EGC's submittals, and finds that relocation of these requirements to licensee-controlled documents (described above) is acceptable in that changes to these documents will be adequately controlled by 10 CFR 50.59 and other regulations (described above). These provisions will continue to be implemented by appropriate plant procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R lists all specifications that are relocated, based on the Final Policy Statement, to EGC-controlled documents. Table R provides: a DOC identification number referenced to ITS Section; a CTS reference; a summary description of the requirement; the name of the document that retains the CTS requirements; and the method for controlling future changes to relocated requirements. The NRC staff evaluation of each relocated specification and specific CTS detail presented in Table R is provided below.

3/4.2.E Control Rod Block Actuation

The CTS requires the control rod block actuation channels shown in Table 3.2.E-1 to be operable with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.2.E-1. Several control rod block actuation functions are relocated to the TRM.

3/4.2.E.2 Average Power Range Monitors (APRM)

The APRM control rod block instrumentation is installed to prevent conditions that would otherwise require actuation of the RPS if plant conditions were allowed to persist, such as during a "control rod withdrawal error at power." The APRMs use LPRM signals to provide information about the average core power and to create the APRM rod block signal. However, the rod block function of the APRMs is not used to mitigate a DBA or transient.

3/4.2.E.3 Source Range Monitors (SRM)

The SRM control rod block instrumentation is installed to monitor neutron flux during refueling, shutdown, and startup conditions. When IRMs are not above Range 2, the SRM control rod block prevents a control rod withdrawal if the count rate exceeds a preset value or falls below a preset limit. However, the rod block signals initiated by the SRMs are not used to mitigate a DBA or transient.

3/4.2.E.4 Intermediate Range Monitors (IRM)

The IRM control rod block instrumentation is installed to monitor the neutron flux levels during refueling, shutdown, and startup conditions. The IRM control rod block prevents a control rod

withdrawal if the IRM reading exceeds a preset value, or if the IRM is inoperable. However, the rod block signals initiated by the IRMs are not used to mitigate a DBA or transient.

3/4.2.E.5 Scram Discharge Volume (SDV)

The Scram Discharge Volume (SDV) control rod block instrumentation uses signals derived from SDV level monitors to prevent control rod withdrawals when accumulated water reaches a pre-set level in the SDV. This instrumentation ensures there is sufficient volume remaining in the SDV to contain the water discharged by the control rod drives during a scram, thus ensuring that the control rods will be able to insert fully. This rod block signal also provides an indication to the operator that water is accumulating in the SDV and prevents further rod withdrawals. With continued water accumulation, a reactor protection system initiated scram signal will occur. Thus, the SDV water level rod block signal provides an opportunity for the operator to take action to avoid a reactor scram. However, the rod block signals initiated by the SDV instrumentation is not used to mitigate a DBA or transient.

3/4.2.F Accident Monitoring Instrumentation

All Regulatory Guide 1.97 non-Type A, non-Category 1 instruments ~~and all Regulatory Guide 1.97 non-Category 1 instruments~~ specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97 are relocated to the TRM. The CTS require the accident monitoring instrumentation channels shown in Table 3.2.F-1 to be operable. Accident monitoring instrumentation is provided to monitor variables and systems over their anticipated ranges for accident conditions as appropriate to ensure adequate safety during and following accidents. These variables are used by the control room operating personnel to perform their role in the emergency plan in the evaluation and assessment, monitoring and execution of control room functions when other emergency response facilities are not effectively manned.

The NRC staff documented deterministic screening criteria for post-accident monitoring instrumentation in letter dated May 7, 1988 from T.E. Murley (NRC) to R.F. Janecek (BWROG). The staff requires all plant-specific Regulatory Guide 1.97 Type A instruments specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97, and all Regulatory Guide 1.97 Category 1 instruments to be included in ITS. Accordingly, this position has been applied to the Dresden 2 and 3 Regulatory Guide 1.97 instruments.

The CTS accident monitoring instruments that do not meet the RG 1.97 deterministic criteria and which are relocated include: Drywell air temperature, safety and relief valve position indicators - acoustic and temperature, neutron monitoring (source range), and torus air temperature. Those instruments meeting the criteria are retained by the ITS criteria.

3/4.2.H Explosive Gas Monitoring Instrumentation

Explosive gas monitoring instrumentation are relocated to the TRM. The CTS require explosive gas monitoring instrumentation channels shown in Table 3.2.H-1 to be operable with their Alarm/Trip setpoints set to ensure that the limits of specification 3.8.H are not exceeded. The explosive gas monitoring instrumentation monitors the gaseous radwaste treatment system process for potentially explosive gas mixtures to ensure that hydrogen concentration is maintained below the flammability limit. However, the offgas system is designed to contain detonations without affecting safety related equipment functions. Neither the concentration of

hydrogen in the offgas stream, nor the instrumentation used to monitor the hydrogen concentration are an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.2.I Suppression Chamber and Drywell Spray Actuation

Suppression chamber and drywell spray actuation instrumentation are relocated to the TRM. CTS require the suppression chamber and drywell spray actuation instrumentation channel(s) shown in Table 3.2.I-1 to be operable with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.2.I-1. The suppression chamber and drywell spray actuation instrumentation preclude inadvertent actuation of containment and suppression pool sprays during a LOCA. In the presence of a LOCA signal, the spray valves can not open unless 1) the reactor vessel water level is above the 2/3 core height level, to preclude diversion of LPCI when water inventory is needed for core flooding, and 2) the drywell pressure is ~~between~~ ≥ 0.5 psig and ≤ 1.5 psig, to ensure ~~a line break is detected~~ a valid need for operating drywell and suppression chamber sprays.

The operability of the suppression chamber and drywell spray actuation instrumentation does not affect the operability of LPCI. If either of the two instruments trip too soon, the other instrument Function still ensures that flow is not diverted away from core flooding. While tripping of both the instruments allow the permissives for opening drywell and suppression pool spray valves to be met, inadvertent operation does not automatically result, since manual actions must still be taken to open the valves. In addition, if a LOCA signal is not present, this instrumentation does not preclude operation of the drywell and suppression pool spray valves. Therefore, inadvertent operation of drywell spray has been analyzed at Dresden 2 and 3 and does not result in containment failure due to operation of the reactor building-suppression chamber and the suppression chamber-drywell vacuum breakers. These vacuum breakers are controlled by both CTS and ITS. Therefore, operability of the Drywell Spray System and the Suppression Chamber Spray System are not impacted.

If the instruments trip too late or not at all, then no flow can be diverted by the drywell and suppression chamber sprays; thus LPCI is not affected. The only Technical Specification system affected in this case are the Drywell Spray System and the Suppression Chamber Spray System. A failure of the instrumentation to function would preclude the spray valves from being opened from the control room. However, these systems are manually controlled systems that are not needed for a minimum of 10 minutes following a DBA LOCA, and the valves could still be opened locally at the valve operator. In addition, the instruments could be overridden to allow operation from the control room. Therefore, operability of these instruments are not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.3.N Economic Generation Control System

The Economic Generation Control System ~~limits~~ requirements are relocated to the TRM. CTS 3/4.3.N specify that the economic generation control system (EGCS) may be in operation with automatic flow control provided that core flow is ≥ 65% and ≤ 100% of rated core flow, and thermal power is ≥ 20% of rated thermal power. The system was designed to allow the load dispatcher to control power output of the station within appropriate limits based on reactor operating conditions. These EGCS limiting conditions for operation were chosen to be well within the analyzed system setpoints utilized in design basis accident (DBA) and transient analyses; however, the EGCS limits ~~do not rely on~~ are not relied on for any assumptions used in DBA or transient analyses. The

requirements of the EGCS LCO do not meet the requirements for TS and have been relocated to the TRM.

3/4.6.N Structural Integrity

The CTS requirements that the structural integrity of ASME Code Class 1, 2 and 3 components (pumps and valves) be maintained operable in accordance with Specification 4.6.N are relocated to the TRM. Specification 4.6.N establishes the programmatic elements for conducting ASME Code Class 1, 2, and 3 component inspections by reference to Section XI of the ASME Boiler and Pressure Vessel Code. The safety basis for establishing programmatic requirements on structural integrity in CTS relate to prevention of component degradation and continued long term maintenance of acceptable structural conditions. Therefore, structural integrity of safety systems are not operational limits that are an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.7.L Drywell Spray

CTS require the Drywell Spray function of the low pressure coolant injection (LPCI)/containment cooling systems to be operable with two independent subsystems, each subsystem consisting of one operable LPCI pump, and an operable flow path capable of recirculating water from the suppression pool through a heat exchanger and the drywell spray nozzles. These requirements are relocated to the TRM.

The drywell spray function of the LPCI/containment cooling systems is utilized in post-LOCA conditions to condense steam in the drywell, thereby further lowering containment pressure. Emergency operating procedures direct manual initiation of the drywell spray function of the LPCI/containment cooling systems. However, in the analysis of the bounding event for containment pressurization due to the DBA, the drywell spray function of the LPCI/containment cooling systems was not utilized for mitigation of the event. The drywell spray function is not required for proper performance of the containment pressure suppression system and is not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.8.E Flood Protection

Flood protection requirements are relocated to the TRM. Flood protection shall be available for all required safe shutdown systems, components and structures. This Technical Specification has provisions for high river level. A high river water level is a preliminary indication of flood conditions. Flooding is not a design basis accident (DBA) or transient. In addition, flooding is not postulated to occur during any DBA or transient, thus river water level (as it pertains to flooding) is not credited in any safety analysis. The Flood Protection Technical Specification requirements were put in place to ensure that facility protective actions will be taken and operation will be terminated in the event of flood conditions. This requirement is adequately controlled in plant emergency procedures.

3/4.8.G Sealed Source Contamination requirements

Sealed Source Contamination limits are relocated to the TRM. CTS specifies removable contamination limits for sealed sources. Each sealed source containing radioactive material in excess of 100 microcuries of either beta or gamma emitting material or 5 microcuries of alpha

emitting material shall be free of ≥ 0.005 microcuries of removable contamination. These limits ensure that the total body or individual organ irradiation doses do not exceed ingestion or inhalation limits. This TS requirement and the associated Surveillance Requirements do not relate to the operational conditions or limitations that are necessary to ensure safe reactor operation. Sealed source contamination limits are not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.10.E Communications

Communication requirements are relocated to the TRM. CTS specify that direct communications are to be maintained between the control room and refueling platform personnel to ensure that refueling personnel can be promptly informed of significant changes in the plant status or core reactivity condition during refueling operations. Communications between control room and refuel platform personnel are necessary for coordinating activities such as the insertion of control rods prior to loading fuel. However, operable control room communications with refueling platform personnel is not an assumption for response to refueling system failures, or design accident or transient response.

The relocated CTS discussed above are not required to be in the TS under 10 CFR 50.36 and do not meet any of the four criteria in the Final Policy Statement. They are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, the NRC staff finds that sufficient regulatory controls exist under the regulations cited above to maintain the effect of the provisions in these specifications. The NRC staff has concluded that appropriate controls have been established for all of the current specifications, information, and requirements that are being moved to EGC-controlled documents. This is the subject of a license condition established herewith. TRM Until incorporated in the UFSAR and procedures, changes to these specifications, information, and requirements will be controlled in accordance with the applicable current procedures that control these documents. Following implementation, the NRC will audit the removed provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59. Accordingly, these specifications, information, and requirements, as described in detail in this SE, may be relocated from CTS and placed in the UFSAR or other EGC-controlled documents as specified in EGC's letter of **date.**

F. Control of Specifications, Requirements, and Information Removed from the CTS

The facility and procedures described in the UFSAR and TRM, incorporated into the UFSAR by reference, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures records are maintained and establishes appropriate control over requirements removed from CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with other applicable regulatory requirements: for example, the ODCM can be changed in accordance with ITS 5.5.1; the emergency plan implementing procedures (EPIPs) can be changed in accordance with 10 CFR 50.54(q); and the administrative instructions that implement the QA Plan can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. Temporary procedure changes are also controlled by 10 CFR 50.54(a). The documentation of these

procedure changes are also controlled by 10 CFR 50.54(a). The documentation of these changes will be maintained by EGC in accordance with the record retention requirements specified in EGC's QA plan for Dresden and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS addresses the implementation of the ITS conversion and when the relocation of the CTS requirements into licensee-controlled documents will be completed. The submittal of the updated licensee-controlled documents (e.g., UFSAR) to the Commission will be as required by, and in accordance with, the regulations (e.g., 10 CFR 50.71(e) for the updated UFSAR), and not be as part of the implementation of the ITS.

G. Other TS Changes Included in the Application

This section evaluates other TS changes included in EGC's ITS conversion application. These include items which deviate from both the CTS and the STS, do not fall clearly into a category, or are in addition to those changes that are needed to meet the overall purpose of the conversion.

Conversion to ITS Section 3.6.1.3

moved

CTS 4.7.A.2 verifies that all penetrations not capable of being closed by automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges or deactivated automatic valves secured in their position, except as provided in CTS 3.7.D. In the ITS, this surveillance is relocated from the CTS Primary Containment Integrity specification (CTS 3/4.7.A) to the ITS Primary Containment Isolation Valve Specification (ITS 3.6.1.3) and broken up into two specifications - one for valves and blind flanges outside containment and one for valves and blind flanges inside containment. During the review of the licensee's submittal, a difference of opinion arose between the staff and the licensee as to what would constitute a failure of this CTS surveillance and what appropriate actions should be taken. The staff concedes that the wording and structure of the Dresden CTS would allow several interpretations of how CTS 4.7.A.2 is to be met, what actions to take if the surveillance is not met, and which ITS Action Notes are implied by the CTS wording in CTS 3/4.7.A. Depending on the interpretation, the change from the CTS to the ITS could be characterized as Administrative, More Restrictive, Less Restrictive, or a combination thereof.

In addition, the staff concedes that there are several interpretations of how CTS 3.6.M Action and 3.7.D Action 1 can be applied to penetrations with one primary containment isolation valve. One interpretation would require an immediate shutdown since there is no other OPERABLE isolation valve. Another interpretation considers the closed system boundary as the other OPERABLE isolation valve. Depending on which interpretation is used, the change from the CTS to ITS 3.6.1.3 Action C could be characterized as Administrative, Less Restrictive, or a combination of the two.

One objective of the conversion to the ITS is to correct these types of problem areas. The Dresden ITS provide the appropriate SRs and Actions, if the surveillances are not met, to correct the ambiguity of the CTS while not degrading the safe operation of the plant. Thus, the staff finds that ITS 3.6.1.3 is acceptable.

and

Conversion to 24 Month Surveillance Interval (LD, LE, LF)

Improved reactor fuels allow licensees to consider increasing the duration of the fuel cycle for their facilities. The staff has reviewed and approved a number of requests to extend surveillance requirements to accommodate a 24-month fuel cycle. The staff has found that the effect on plant safety is small because safety systems use redundant electrical and mechanical components and because licensees perform other surveillances during plant operation that confirm that these systems and components can perform their safety functions.

Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," issued on April 2, 1991, provides staff guidance that identifies the types of information that must be addressed when proposing extensions of the fuel cycle to 24 months. The GL addressed steam generator inspections (which are not applicable to Dresden), leak rate testing pursuant to Appendix J to 10 CFR Part 50 (which is not applicable to Dresden because individual leak testing requirements have been replaced by the Primary Containment Leakage Rate Testing Program), instrument drift, and other 18-month surveillances that are extended to 24 months.

The GL requires that licensees address instrument drift when proposing an increase in the surveillance interval for calibrating instruments that perform safety functions including providing the capability for safe shutdown. The effect of the increased calibration interval on instrument errors must be addressed because instrument errors caused by drift were considered when determining safety system setpoints and when performing safety analyses.

For the remaining 18-month surveillances, the GL requires the following information to support conversion to a 24-month operating cycle:

(1) Licensees should evaluate the effect on safety of an increase in 18-month surveillance intervals to accommodate a 24-month fuel cycle. This evaluation should support a conclusion that the effect on safety is small.

(2) Licensees should confirm that historical plant maintenance and surveillance data support this conclusion.

(3) Licensees should confirm that assumptions in the plant licensing basis would not be invalidated on the basis of performing any surveillance at the bounding surveillance interval limit provided to accommodate a 24-month fuel cycle.

In consideration of these confirmations, the staff concluded that licensees need not quantify the effect of the change in surveillance intervals on the availability of individual systems or components.

INSTRUMENT DRIFT

The staff's review grouped the instrumentation changes together. This primarily includes extensions of channel calibrations and logic system functional tests from 18 to 24 months.

By letter dated March 3, 2000, the licensee submitted a request to amend the Facility Operating Licenses for Dresden, LaSalle, and Quad Cities nuclear power plants. The amendment proposes changes to the technical specifications (TS) to extend the surveillance intervals for selected TS items from 18 months to 24 months. By letter dated March 24, 2000, the licensee submitted the methodology used for the determination of instrument setpoints and allowable values. On April 27, 2000, a meeting was held with the licensee to discuss the staff request for additional information and by letter dated June 5, 2000, the licensee provided the information requested by the staff. On August 22 and 23, a meeting was held with the licensee to review their sample calculations. During that meeting, the staff identified some concerns with the licensee's response of June 5, 2000, and by letter dated November 30, 2000, the licensee provided the response to resolve the staff's concerns.

GL 91-04 required that information in seven specific areas be addressed in order to provide an acceptable basis for increasing the calibration interval for instruments that are used to perform safety functions. The following discussion identifies these seven areas and includes a summary of the licensee's response along with the staff's conclusions.

(1) Confirm that instrument drift as determined by as-found and as-left calibration data from surveillance and maintenance records have not, except on rare occasions, exceeded acceptable limits for a calibration interval.

(2) Confirm that the values of drift for each instrument type (make, model, and range) and application have been determined with a high probability and a high degree of confidence. Provide a summary of the methodology and assumptions used to determine the rate of instrument drift with time based upon historical plant calibration data.

(3) Confirm that the magnitude of instrument drift has been determined with a high probability and a high degree of confidence for a bounding calibration interval of 30 months for each instrument type (make, model number, and range) and application that performs a safety function. Provide a list of the channels by TS section that identifies these instrument applications.

(4) Confirm that a comparison of the projected instrument drift errors has been made with the values of drift used in the setpoint analysis. If this results in revised setpoints to accommodate large drift errors, provide proposed TS changes to update trip setpoints. If the drift errors result in a revised safety analysis to support existing setpoints, provide a summary of the updated analysis conclusions to confirm that safety limits and safety analysis assumptions are not exceeded.

(5) Confirm that the projected instrument errors caused by drift are acceptable for control of plant parameters to effect a safe shutdown with the associated instrumentation.

(6) Confirm that all conditions and assumptions of the setpoint and safety analyses have been checked and are appropriately reflected in the acceptance criteria of plant surveillance procedures for channel checks, channel functional tests, and channel calibrations.

(7) Provide a summary description of the program for monitoring and assessing the effects of increased calibration surveillance intervals of instrument drift and its effect on safety.

The licensee performed a safety assessment for the proposed changes to the surveillance test intervals in accordance with the GL 91-04 guidance stated above. This assessment entailed reviewing the historical maintenance and surveillance test data at the bounding surveillance test interval limit, performing an evaluation to ensure that a 24-month surveillance test interval would not invalidate any assumption in the plant licensing bases, and the determination that the effect of the surveillance interval extension is small.

In their submittals of March 3, and 24, 2000, the licensee identified Nuclear Engineering Standard NES-EIC-20.04, Rev. 1, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy," which included Appendix J, "Guidelines For the Analysis and Use of As-Found/As-Left Data," as the basis for performing analyses of drift for all affected instrument loops in order to establish the effect of a 30-month (24 months + 25% allowable tolerance) calibration frequency on instrument performance. This ~~appendix is~~ based on Electric Power Research Institute (EPRI) TR-103335, "Guidelines for Instrument Calibration Extension/Reduction Programs," Rev. 1, October 1998. Additionally, these evaluations and analyses have been performed utilizing the guidance provided in The licensee has used Microsoft Excel spreadsheets to document information for performing additional analyses to be consistent with the analyses recommended by NRC in its safety evaluation report (SER) for the Peach Bottom Atomic Power Station, Units 2 and 3. for the methodology described in NEDC-31336P-A, "General Electric Instrument Setpoint Methodology," dated September 1996 (for Nuclear Instrumentation System Functions only).

During the meeting of April 27, 2000, the staff identified concerns with the licensee's sample data, outlier determination, time dependency, the graded approach to instrument setpoint determination (Appendix D to the Nuclear Engineering Standard), and miscellaneous other items. Based on the staff's comments, the licensee, by letter dated June 5, 2000, submitted the revised Nuclear Engineering Standard and their justification for surveillance extensions. The staff reviewed the revised documents and was still concerned with the outlier determination, time dependency, and the graded approach to instrument setpoint determination. However, during a conference call the licensee was able to satisfy the staff's concerns and it was decided to have a meeting to review some sample calculations to better understand the licensee's methodology. The staff reviewed the sample calculations and determined the licensee's approach acceptable but wanted the licensee to revise the Nuclear Engineering Standard to clearly describe their methodology. Based on this, the licensee provided Rev. 3 of the Nuclear Engineering Standard and submitted a letter dated November 30, 2000, to state that graded approach to setpoint determination has not been used by the licensee.

The staff has reviewed the licensee's submittals, including the responses to additional information, and has verified that the licensee has addressed the issues identified in GL 91-04 and provided an acceptable basis for increasing the calibration interval and for determining the instrument setpoint and allowable values for instruments that are used to perform safety functions. On the basis of the evaluation, the staff concludes that the licensee has confirmed that safety limits and safety analysis assumptions will not be exceeded after the worst-case drift is considered for the instruments whose surveillance intervals will be extended to 24 months.

On the basis of its review, the staff concludes that the proposed methodology for extending surveillance intervals for certain safety-related instrumentation components is consistent with the guidance in GL 91-04 in that the licensee has demonstrated that the effect of extending the surveillance intervals to 24 months is negligible and the system will continue to perform within assumed limits during the longer surveillance interval. The staff also finds that the instrument setpoint methodology used by the licensee to determine the allowable values is acceptable.

NON-INSTRUMENTATION CHANGES

Regarding non-instrumentation changes, GL 91-04 requires licensees to evaluate the effect on safety of the change in surveillance intervals to accommodate a 24-month fuel cycle. This evaluation should support a conclusion that the effect on safety is small. In addition, licensees should confirm that the performance of surveillances at the bounding surveillance interval limit provided to accommodate a 24-month fuel cycle would not invalidate any assumption in the plant licensing basis. In consideration of these confirmations, the licensees need not quantify the effect of the change in surveillance intervals on the availability of individual systems or components.

To address the requirements of the GL 91-04, the licensee has referenced the NRC SER (dated August 2, 1993) relating to the extension of the Peach Bottom Units 2 and 3 surveillance intervals from 18 months to 24 months. In this SER, the staff stated the following:

> *Industry reliability studies for boiling water reactors (BWRs), prepared by the BWR Owners Group (NEDC-30936P) show that the overall safety systems' reliabilities are not dominated by the reliabilities of the logic system, but by that of the mechanical components, (e.g., pumps and valves), which are consequently tested on a more frequent basis. Since the probability of a relay, or contact failure is small relative to the probability of mechanical component failure, increasing the Logic System Functional Test interval represents no significant change in the overall safety system unavailability.*

The licensee has reviewed the surveillance test history at Dresden and has validated this conclusion. The licensee's review has demonstrated that there are no failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

The following discussion describes how the staff determined that the effect of extending surveillance intervals on plant safety is small. The staff's review focused on redundant electrical and mechanical components as well as other surveillances conducted during plant operation that confirm that these systems and components can perform their safety functions.

<u>TS 3.1.7</u> <u>Standby Liquid Control (SLC) System</u>

The SLC system is a backup to the control rod drive system and designed to be single-failure proof.

<u>SR 3.1.7.8</u> Verify flow through one SLC subsystem from pump into reactor pressure vessel.

This SR ensures that the SLC system is capable of injecting into the reactor pressure vessel by verifying a flow path and also by firing one of the explosive valves.

<u>SR 3.1.7.9</u> Verify all heat traced piping between storage tank and pump suction is unblocked.

This SR ensures that the SLC system is capable of injecting into the reactor pressure vessel by verifying a flow path through the heat traced piping.

System availability during the operating cycle is assured by:

- The SLC system is designed so that all active components are single failure proof.
- Each SLC pump is tested during the operating cycle in accordance with the Inservice Testing Program.
- Daily SRs verifies that temperatures in the SLC system tank and the SLC pump suction piping precludes boron precipitation.
- Monthly SRs ensure the continuity of the explosive charge on the discharge valves.
- The explosive valves are designed to be highly reliable.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

<u>TS 3.1.8</u> <u>Scram Discharge Volume (SDV) Vent and Drain Valves</u>

<u>SR 3.1.8.3</u> Verify each SDV vent and drain valve:

a. Closes in ≤ 30 seconds after receipt of an actual or simulated scram signal; and
b. Opens when the actual or simulated scram signal is reset.

This SR ensures that the SDV vent and drain valves close in ≤ 30 seconds after receipt of an actual or simulated scram signal and open when the actual or simulated scram signal is reset.

System availability during the operating cycle is assured by:

- SR 3.1.8.2 requires that the SDV vent and drain valves be cycled fully closed and fully open once every 92 days during the operating cycle.
- Performance of SR 3.1.8.2 demonstrates that mechanical components and portions of the valve logic remain operable.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

<u>TS 3.5.1</u> <u>ECCS - Operating</u>

The staff's evaluation for TS 3.5.1 separately groups ECCS systems (i.e., SRs 3.5.1.7 and 3.5.1.8) and the ADS (i.e., SRs 3.5.1.9, and 3.5.1.10).

<u>SR 3.5.1.7</u> Verify, with reactor pressure ≤ 180 psig, the HPCI pump can develop a flow rate of ≥ 5000 gpm against a system head corresponding to reactor pressure.

This SR ensures that the high pressure coolant injection system (HPCI) can perform its design function by developing the appropriate system flow.

SR 3.5.1.8 Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.

This SR includes the HPCI system, the low pressure coolant injection (LPCI) system, and the core spray (CS) system. The ECCS functional test ensures that a system initiation signal (actual or simulated) to the automatic initiation logic will cause the systems or subsystems to operate as designed, including actuation of the system throughout its emergency operating sequence, automatic pump startup and actuation of automatic valves to their required positions.

HPCI, LPCI, and CS system availability during the operating cycle is assured by:

- The ECCS network has built-in redundancy so that no single-failure prevents starting of the ECCS.
- Extensions of the calibration cycle and logic system functional test frequency have previously been justified.
- Pumps and valves associated with these systems are tested in accordance with the Inservice Testing program. These tests will detect significant failures in the ECCS subsystems.
- SR 3.5.1.1, which is performed once every 31 days, ensures that the ECCS piping systems are filled with water to prevent water hammer affects.
- SR 3.5.1.2, which is performed once every 31 days, ensures that the ECCS valves are in the correct position.
- SR 3.5.1.3, which is performed once every 31 days, verifies the correct breaker alignment to the LPCI swing bus.
- The licensee's review of surveillance test history for the ECCS system did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

SR 3.5.1.9 Verify the ADS actuates on an actual or simulated automatic initiation signal.

This SR verifies that the ADS operates as designed when initiated either by an actual or simulated initiation signal and that the valve and solenoid are functioning properly.

SR 3.5.1.10 Verify each required ADS valve opens when manually actuated.

This SR verifies that the ADS function operates as designed when manually actuated and also ensures the valve actuator and solenoids operate properly.

System availability during the operating cycle is assured by:

- The ADS has built-in redundancy so that no single-failure prevents the opening of the required number of ADS valves.
- The relief valves associated with the ADS are equipped with remote manual switches so that the entire system can be operated manually as well as automatically.

• SR 3.5.2.3, which is performed every 31 days ensures that the ECCS valves are in the correct position.

- The licensee's review of surveillance test history for the ADS system did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.5.2 ECCS - Shutdown

SR 3.5.2.5 Verify each required ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.

This SR includes the HPCI system, the LPCI system, and the CS system. The ECCS functional test ensures that a system initiation signal (actual or simulated) to the automatic initiation logic will cause the systems or subsystems to operate as designed, including actuation of the system throughout its emergency operating sequence, automatic pump startup and actuation of automatic valves to their required positions.

HPCI, LPCI, and CS system availability during the operating cycle is assured by:

- The ECCS network has built-in redundancy so that no single-failure prevents starting of the ECCS.
- Extensions of the calibration cycle and logic system functional test frequency have previously been justified.
- Pumps and valves associated with these systems are tested in accordance with the Inservice Testing program. These tests will detect significant failures in the ECCS subsystems.
- SR 3.5.2.1, which is performed once every 12 hours, verifies for each required ECCS subsystem that (a) suppression pool water level is $\geq$ 10 ft 4 inches, or (b) contaminated condensate storage tank water level is $\geq$ 21 ft.
- SR 3.5.2.2, which is performed once every 31 days, verifies for each required ECCS subsystem that the piping is filled with water.
- The licensee's review of surveillance test history for the ECCS systems did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.5.3 Isolation Condenser (IC) System

SR 3.5.3.3 Verify the IC System actuates on an actual or simulated automatic initiation signal.

The IC system functional test ensures that a system initiation signal (actual or simulated) to the automatic initiation logic of IC will cause the system ~~or subsystems~~ to operate as designed, including actuation of the system throughout its emergency operating sequence, and actuation of ~~all~~ automatic valves to their required positions. The safety analysis does not take credit for operation of the IC system.

all

System availability during the operating cycle is assured by:

- SR 3.5.3.1, which will continue to be performed at 24 hour intervals, verifies shell side water level and temperature to ensure IC system operability.
- SR 3.5.3.2, which will continue to be performed once every 31 days, ensures that all valves in the IC system are in their correct position.
- The functions performed by the IC system can also be performed by the HPCI system. Technical Specifications prohibit the IC and HPCI systems to remain inoperable concurrently.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information and the fact that the IC system is not relied upon in the safety analysis, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.1.1 Primary Containment

SR 3.6.1.1.2 Verify drywell-to-suppression chamber bypass leakage is ~~less than or equal to the bypass leakage limit. However, during the first unit startup following bypass leakage testing performed in accordance with this SR, the acceptance criterion is ≤ 2% of the drywell-to suppression chamber bypass leakage limit.~~ Rev D

acceptable A/√K design value of 0.18 ft² at an initial differential pressure of ≥ 1.0 psid

The drywell-to-suppression chamber bypass leak test ensures that the boundary between the drywell airspace and the suppression chamber airspace is maintained to ensure the pressure suppression function is operable by limiting the amount of bypass steam leakage which would not be directed through the suppression pool water.

System availability during the operating cycle is assured by:

- The suppression chamber-to-drywell vacuum breakers are the only active mechanical devices in the boundary between the drywell air space and the suppression chamber. The vacuum breakers are verified to be in the closed position once every 14 days through performance of proposed SR 3.6.1.8.1. In addition, a functional test of each required vacuum breaker is performed once every 31 days through performance of SR 3.6.1.8.2. These tests ensure that the valves are functional and closed.
- The suppression chamber-to-drywell vacuum breakers include a passive design which does not appear to be subject to any time-based changes that would be affected by the change to a 24-month operating cycle.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.1.3 Primary Containment Isolation Valves (PCIVs)

SR 3.6.1.3.7 Verify each automatic PCIV actuates to the isolation position on an actual or simulated isolation signal.

This SR ensures that each PCIV will actuate to its isolation position on a primary containment isolation signal.

System availability during the operating cycle is assured by:

- The PCIVs, including the actuating logic, are designed to be single-failure proof and, therefore, are highly reliable.
- Extension of the logic system functional test has been previously justified.
- During the operating cycle the PCIVs are either exercised (closed or open) or partially stroked (open or closed) in accordance with the Inservice Testing program or have justifications and reliefs to document why testing on an extended frequency is acceptable. The exercise or partial stroke testing of these PCIVs tests a significant portion of the PCIV's circuitry and will detect failures of this circuitry or failures with valve movement.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

SR 3.6.1.3.8 Verify each reactor instrumentation line excess flow check valve (EFCV) actuates to the isolation position on an actual or simulated instrument line break signal.

This SR provides assurance that the instrumentation line EFCVs will perform as designed by actuating to their isolation position on an actual or simulated instrument line break signal. The 24-month surveillance frequency is based on the need to perform the SR under conditions that apply during a plant outage and the potential for an unplanned transient if the SR were performed with the reactor at power.

System availability during the operating cycle is assured by:

- The instrument lines are seismic category 1 and terminate in instruments that are seismic category 1. The instrumentation piping is composed of quarter-inch piping in the secondary containment that is sized to assure that a postulated failure would limit any offsite exposure to substantially below the standards of 10 CFR Part 100.
- Due to the mechanical nature of the check valves and instrumentation piping system, there are no definable drift components or any time-based conditions that could appreciably change during the operating cycle.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

SR 3.6.1.3.9 Remove and test the explosive squib from each shear isolation valve of the traversing incore probe (TIP) system.

The SR requires that the explosive squib be removed and tested for the shear isolation valve of the TIP system. An in-place functional test is not possible with this design.

System availability during the operating cycle is assured by:

- The replacement charge for the explosive squib is from the same manufactured batch as the one fired or from another batch that has been certified by having one of the batch successfully fired.
- Administrative controls for the explosive charges, such as those that limit shelf life and operating life, are followed.
- SR 3.6.1.3.4 verifies the circuit continuity of the TIP shear isolation valve explosive charge once every 31 days.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.1.7 Reactor Building-to-Suppression Chamber Vacuum Breakers

SR 3.6.1.7.3 Verify the opening setpoint of each vacuum breaker is ≤ 0.5 psid.

This SR ensures that each reactor building-to-suppression chamber vacuum breaker check valve and vacuum breaker butterfly valve is capable of performing its safety function.

System availability during the operating cycle is assured by:

- The vacuum relief system design for the active components has built-in redundancy.
- SR 3.6.1.7.2 requires that each vacuum breaker be functionally tested once every 92 days by cycling each vacuum breaker check valve and butterfly valve. This surveillance ensures that the valves are capable of being cycled and return to the closed position.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.1.8 Suppression Chamber-to-Drywell Vacuum Breaker

SR 3.6.1.8.3 Verify the opening setpoint of each required vacuum breaker is ≤ 0.5 psid.

SR 3.6.1.8.3 verifies the opening setpoint of each suppression chamber-to-drywell vacuum breaker is less than or equal to the specified differential pressure. ~~The 24-month frequency is based on the need to perform this surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the surveillance were performed with the reactor at power.~~ Not consistent with SR 3.6.1.7.3 wording

System availability during the operating cycle is assured by:

- SR 3.6.1.8.1, which is performed once every 14 days, verifies that each vacuum breaker is closed.
- SR 3.6.1.8.2 requires that each vacuum breaker be functionally tested once every 31 days. This surveillance ensures that the valves are capable of being cycled and return to the closed position.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.4.1 Secondary Containment

SR 3.6.4.1.3 Verify the secondary containment can be maintained ≥ 0.25 inch of vacuum water gauge for 1 hour using one standby gas treatment subsystem at a flow rate of ≤ 4000 cfm.

This SR ensures secondary containment boundary integrity by demonstrating that secondary containment vacuum can be maintained.

System availability during the operating cycle is assured by:

- Secondary containment is maintained at a negative pressure during normal plant operation. Any significant degradation to the secondary containment barrier would be detected through loss of vacuum.
- SR 3.6.4.1.1, which is performed once every 24 hours, verifies that the secondary containment vacuum is being maintained at ≥ 0.25 inch water gauge.
- Secondary containment structural integrity is maintained through administrative controls which ensure that no significant changes will be made to the secondary containment without proper evaluation.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

SR 3.6.4.2.3 Verify each automatic SCIV actuates to the isolation position on an actual or simulated signal.

SR 3.6.4.2.3 ensures that each SCIV is capable of performing its intended function by actuating to the isolation position on an actual or simulated actuation signal.

System availability during the operating cycle is assured by:

- SR 3.6.4.2.2, which is performed once every 92 days, verifies that the isolation time of each power operated, automatic SCIV is within limits. This surveillance cycles each automatic SCIV and would detect significant degradation affecting valve operation.
- The active components and power supplies of the SCIVs are designed to be single failure proof.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.6.4.3 Standby Gas Treatment (SGT) System

The SGT system ensures that radioactive materials that leak from the primary containment into the secondary containment following an accident are filtered and adsorbed prior to being exhausted to the environment.

SR 3.6.4.3.3 Verify each SGT subsystem actuates on an actual or simulated initiation signal.

This SR verifies that each SGT subsystem will actuate on an actual or simulated initiation signal.

System availability during the operating cycle is assured by:

- There are two redundant and independent SGT subsystems such that a single-failure will not prevent system operation.
- SR 3.6.4.3.1 is a monthly surveillance that requires each SGT subsystem to be started and operated for > 10 hours with heaters operating. This test verifies system operation and would identify significant system problems or failures.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.7.2 Diesel Generator Cooling Water (DGCW) System

SR 3.7.2.2 Verify each ~~required~~ DGCW pump starts automatically ~~when its associated diesel generator starts~~ on an actual or simulated initiation signal.

The DGCW System functional test, SR 3.7.2.2 ensures that a system start signal from the associated diesel generator will cause the system to operate as designed, by automatically starting the DGCW pump.

System availability during the operating cycle is assured by:

- Each of the DGCW pumps are tested in accordance with the inservice testing program to ensure that each subsystem can provide the proper flow against a specified test pressure. This test will detect significant failures of the DGCW system to perform its intended function.
- SR 3.8.1.2, which requires monthly testing of the diesel generators, verifies operation of the DGCW system. This testing will detect significant failures affecting system operation.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 3.7.4 Control Room Emergency Ventilation (CREV) System

1 The CREV system provides a radiologically controlled environment from which the plant can be safely operated following a LOCA. The CREV is designed to maintain the control room emergency zone environment for a 30 day continuous occupancy after a DBA without exceeding dose limits. The CREV System will pressurize the control room emergency zone to about 0.125 inches water gauge to minimize infiltration of air from adjacent zones.

SR 3.7.4.3 Verify the CREV System actuates on a manual initiation signal.

SR 3.7.4.4 Verify the CREV System can maintain a positive pressure of $\geq$ 0.125 inches water gauge relative to the adjacent areas during the isolation/pressurization mode of operation at a flow rate of $\leq$ 2000 scfm.

SR 3.7.4.3 ensures that the CREV System is capable of manual initiation from the control room. SR 3.7.4.4 ensures that the isolation dampers close as required and that the control room emergency zone boundary leakage is within the capacity of the CREV System by demonstrating that the control room emergency zone can be maintained at a positive pressure with respect to adjacent areas when in the emergency isolation/pressurization mode of operation.

System availability during the operating cycle is assured by:

- SR 3.7.4.1, which is conducted once every 31 days, requires the CREV System be operated for ≥ 10 hours with the heaters operating. These tests would detect significant failures affecting system operation.
- The actual or simulated isolation signal is equivalent to a logic system functional test. Extension of the logic system functional test has been previously justified.
- The control room emergency zone is maintained at a positive pressure during normal operation. Therefore, any substantial degradation of the boundary will be evident and repairs can be accomplished in a timely manner.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

<u>TS 3.7.5</u>   <u>Control Room Emergency Ventilation Air Conditioning (AC) System</u>

The CREV AC system provides a suitable environment for continuous personnel occupancy and ensures the operability of control room equipment and instruments under normal and accident conditions.

<u>SR 3.7.5.1</u>   Verify the Control Room Emergency Ventilation AC System has the capability to remove the assumed heat load.

The SR verifies that the CREV AC System has the capability to remove the assumed heat load. The CREV AC System auto-starts on control room temperature when the CREV System is operating. Both the CREV and the CREV AC are normally maintained in standby and are operated only for required surveillances.

System availability during the operating cycle is assured by:

- SR 3.7.4.1, which is conducted once every 31 days, requires the CREV System be operated for ≥ 10 hours with the heaters operating. The licensee has confirmed that the CREV AC is verified to be operational during the monthly performance of SR 3.7.4.1. These tests would detect significant failures affecting system operation.
- The licensee's review of the surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

<u>TS 3.8.1</u>   <u>AC Sources - Operating</u>

The unit Class 1E AC Electrical Power Distribution Systems AC sources consist of the offsite power sources, and the onsite standby power sources (diesel generators (DGs) 2, 3 and 2/3).

The Class 1E unit AC distribution system is, for the most part, divided into redundant load groups (Division 1 and 2), so loss of any one group does not prevent the minimum safety

functions from being performed. The exception is that the opposite unit's Division 2 AC Electrical Power Distribution System powers shared Division 2 loads (i.e., standby gas treatment subsystem, CREV System (Unit 3 only), and CREV AC System (Unit 3 only)). Although shared by both units, the CREV System and the CREV AC System are single train systems that are powered only from a single Unit 2 motor control center. Each unit's load group has connections to physically independent offsite power sources and a single DG.

The staff's evaluation for SRs 3.8.1.9 through and including 3.8.1.19 have been grouped together.

SR 3.8.1.9 Verify manual transfer of unit power supply from the normal offsite circuit to the alternate offsite circuit.

This SR includes the transfer of each unit auxiliary transformer to the associated unit reserve auxiliary transformer and a verification of the cross tie between the unit's 4160 V ESS buses.

SR 3.8.1.10 Verify each DG rejects a load greater than or equal to its associated single largest post-accident load, and:
a. ① following load rejection, the frequency is ≤ 66.73 Hz;
b. ② Within 3 seconds following load rejection, the voltage is ≥ 3952 V and ≤ 4368 V; and
c. ③ Within 4 seconds following load rejection, the frequency is ≥ 58.8 Hz and ≤ 61.2 Hz.

This SR demonstrates the DG load response characteristics and capability to reject the largest single load without exceeding predetermined voltage and frequency and while maintaining a specified margin to the overspeed trip.

SR 3.8.1.11 Verify each DG does not trip and voltage is maintained ≤ 5000 V during and following a load rejection of ≥ 2340 kW and ≤ 2600 kW.

This SR ensures proper engine generator load response under the simulated test conditions. This test simulates the loss of the total connected load that the DG experiences following a full load rejection and verifies that the DG does not trip upon loss of the load.

SR 3.8.1.12 Verify on an actual or simulated loss of offsite power signal:
a. (A) De-energization of emergency buses;
b. (B) Load shedding from emergency buses; and
c. (C) DG auto-starts from standby condition and:
1. energizes permanently connected loads in ≤ 13 seconds,
2. maintains steady state voltage ≥ 3952 V and ≤ 4368 V,
3. maintains steady state frequency ≥ 58.8 Hz and ≤ 61.2 Hz, and
4. supplies permanently connected ~~and auto-connected~~ loads for ≥ 5 minutes.

This SR verifies all actions encountered from the loss of offsite power, including shedding of the nonessential loads and energization of the emergency buses and respective loads from the DG. It further demonstrates the capability of the DG to automatically achieve the required voltage and frequency within the specified time.

SR 3.8.1.13 Verify on an actual or simulated Emergency Core Cooling System (ECCS) initiation signal each DG auto-starts from standby condition and:

a. A. In ≤ 13 seconds after auto-start achieves voltage ≥ 3952 V and frequency ≥ 58.8 Hz;
b. B. Achieves steady state voltage ≥ 3952 V and ≤ 4368 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz; and
c. C. Operates for ≥ 5 minutes;.
~~D. Permanently connected loads remain energized from the offsite power system; and~~
~~E. Emergency loads are auto-connected to the offsite power system.~~

This SR demonstrates that the DG automatically starts and achieves the required voltage and frequency within the specified time (13 seconds) from the design basis actuation signal (LOCA signal). In addition, the DG is required to maintain proper voltage and frequency limits after steady state is achieved.

SR 3.8.1.14 Verify each DG's automatic trips are bypassed on actual or simulated loss of voltage signal on the emergency bus concurrent with an actual or simulated ECCS initiation signal except:

a. A. Engine overspeed; and
b. B. Generator differential current.

This SR demonstrates that each DG non-critical protective trip is bypassed on an actual or simulated ECCS initiation signal and that critical protective functions trip the DG.

SR 3.8.1.15 Verify each DG operating within the power factor limit operates for ≥ 24 hours:

a. A. For ≥ 2 hours loaded ≥ 2730 kW and ≤ 2860 kW; and
b. B. For the remaining hours of the test loaded ≥ 2340 kW and ≤ 2600 kW.

This SR demonstrates that each DG can start and run continuously at full load capability for an interval of not less than 24 hours, 22 hours of which is at a load equivalent to 90% to 100% of the continuous rating of the DG and 2 hours of which is at a load equivalent to 105% to 110% of the continuous rating of the DG.

SR 3.8.1.16 Verify each DG starts and achieves:

a. A. In ≤ 13 seconds, voltage ≥ 3952 V and frequency ≥ 58.8 Hz; and
b. B. Steady state voltage ≥ 3952 V and ≤ 4368 V and frequency ≥ 58.8 Hz and ≤ 61.2 Hz.

This SR demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal surveillances, and achieve the required voltage and frequency within 13 seconds.

SR 3.8.1.17 Verify each DG:

a. A. Synchronizes with offsite power source while loaded with emergency loads upon a simulated restoration of offsite power;
b. B. Transfers loads to offsite power source; and
c. C. Returns to ready-to-load operation.

This SR demonstrates that the manual synchronization and automatic load transfer from the DG to the offsite source can be made and that the DG can be returned to ready to load status when offsite power is restored. It also ensures that the auto-start logic is reset to allow the DG to reload if a subsequent loss of offsite power occurs.

≥90% the

SR 3.8.1.18 Verify interval between each sequenced load block is ~~within ± 10%~~ ≥90% of the design interval for each load sequence time delay relay.

≥90% interval

This SR verifies that the sequence time is ~~within ±10 percent~~ ≥90% of the design interval for each load sequence timer. Under accident conditions, loads are sequentially connected to the bus by the time delay relays. The time delay relays control the permissive and starting signals to motor breakers to prevent overloading of the ~~bus power supply~~ DGs due to high motor starting currents.

SR 3.8.1.19 Verify, on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated ECCS initiation signal:

a. ~~(A)~~ De-energization of emergency buses;
b. ~~(B)~~ Load shedding from emergency buses; and
c. ~~(C)~~ DG auto-starts from standby condition and:
   1. energizes permanently connected loads in ≤ 13 seconds,
   2. energizes auto-connected emergency loads (including through time delay relays, where applicable),
   3. maintains steady state voltage ≥ 3952 V and ≤ 4368 V,
   4. maintains steady state frequency ≥ 58.8 Hz and ≤ 61.2 Hz, and
   5. supplies permanently connected and auto-connected emergency loads for ≥ 5 minutes.

This SR demonstrates operation of each DG during a loss-of-offsite power test signal coincident with an ECCS initiation.

AC Source system availability during the operating cycle is assured by:

- SR 3.8.1.2 requires that each DG be tested for operability once every 31 days. This testing, which is not being changed, will provide prompt identification of any substantial DG degradation or failure.
- SR 3.8.1.8 requires that each DG be fast start tested once every 184 days. This test, which is not being changed, will provide prompt identification of any substantial DG degradation or failure.
- DGs are not operated outside of the monthly operability tests in order to minimize wear related degradation.
- DG attributes subject to degradation due to aging, such as fuel oil quality, are subject to its requirements for replenishment and testing.
- An evaluation of known failures did not identify any time-based elements that would invalidate the conclusion that the increased operating cycle will have a small, if any, impact on system reliability.
- The licensee's review of the surveillance test history did not identify any test failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed changes for SRs 3.8.1.9 through 3.8.1.19 on plant safety are small and, therefore, acceptable.

TS 3.8.4 DC Sources - Operating

The DC electrical power systems provide the AC emergency power system with control power. They also provide both motive and control power to selected safety related equipment. DC subsystems provide DC electrical power to inverters, which in turn power the AC essential service buses.

The 250 VDC power sources provide motive power to selected safety related larger DC loads such as DC motor-driven pumps and valves. The Division 1 and Division 2 125 VDC power sources provide both motive and control power to selected safety related equipment, as well as circuit breaker control power for the non-safety related 4160 switchgear, and all 480 V load centers.

The staff's evaluation for SRs 3.8.4.4 through and including 3.8.4.8 have been grouped together.

SR 3.8.4.4 Verify battery cells, cell plates and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance.

SR 3.8.4.5 Remove visible corrosion, and verify battery cell to cell and terminal connections are coated with anti-corrosion material.

SR 3.8.4.6 Verify battery connection resistance is:
a. ≤ 1.5E-4 ohm for inter-cell connections; and
b. ≤ 1.5E-4 ohm for terminal connections.

SR 3.8.4.7 Verify each required 125 V battery charger supplies ≥ 200 amps at ≥ 130 VDC for ≥ 4 hours for the 125 VDC subsystems.

SR 3.8.4.8 Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.

System availability during the operating cycle is assured by:

- The design, in conjunction with the technical specification requirements which limit the extent and duration of inoperable DC sources, provides substantial redundancy in DC sources.
- Battery parameters such as float voltage, electrolyte level, and specific gravity are monitored during the operating cycle to verify battery operability and will provide prompt identification of any substantial battery or battery charger degradation or failure. As an example, SR 3.8.4.1, which is performed once every 7 days, verifies that battery terminal voltage on float charge is within limits.
- Batteries are not discharged except for the performance of the operating cycle test demonstrations of operability. Therefore, there is minimal risk of age-related degradation.

- SR 3.8.4.2, which is performed once ~~every 92 days, requires~~ monitoring for visible corrosion at battery terminals and connectors. These examinations will provide prompt identification of any substantial battery degradation.
- The licensee's review of surveillance test history did not identify any test failures that would invalidate the conclusion that ~~the impact, if any, on~~ system availability is minimal from a change to a 24-month operating cycle.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

Administrative Controls

TS 5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Low Pressure Coolant Injection, Isolation Condenser, Shutdown Cooling, Reactor Water Cleanup, process sampling, containment monitoring, and Standby Gas Treatment.

The program includes integrated leak test requirements for each system. The frequency of performing these tests is being changed from once per operating cycle to once every 24 months.

System availability during the operating cycle is assured by:

- Most portions of the subject systems included in this program are visually walked down, while the plant is operating, during plant testing, and/or operator/system engineer walkdowns. In addition, housekeeping/safety walkdowns also serve to detect any gross leakage. If leakage is observed from these walkdowns, corrective actions will be taken for repairs. systems
- Plant radiological surveys will identify any potential sources of leakage. System walkdowns and surveys provide monitoring of the systems at a greater frequency than once per refueling cycle and would identify any significant system degradation or failures.
- The licensee's review of historical maintenance and surveillance data demonstrates that there is no adverse trend that would invalidate the conclusion that the impact on system availability, if any, is minimal from the proposed change.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

TS 5.5.7 Ventilation Filter Testing Program (VFTP)

The VFTP shall establish the required testing of the engineered safety feature filter ventilation systems. The frequency for filter testing as described in the VFTP for the standby gas treatment (SGT) and control room emergency ventilation (CREV) systems is being changed from 18 to 24 month intervals.

System availability during the operating cycle is assured by:

- Both the SGT and CREV Systems are normally in standby. Therefore, the systems are not subject to degradation due to plant operation.
- Additional system testing is required if the potential for degradation occurs (i.e., following any structural maintenance on the HEPA filter or charcoal adsorber housings, following painting, fire, or chemical release in any ventilation zone communicating with the systems).
- The licensee's review of historical maintenance and surveillance data demonstrates that there are no failures that would invalidate the conclusion that the impact on system availability, if any, is minimal from the proposed changes.

Based on this information, the staff concludes that the proposed change on plant safety is small and, therefore, acceptable.

<u>Additional TS Changes and Beyond-Scope Items</u>

<<<To be provided later.>>>

IV. STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

V. ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an Environmental Assessment and Finding of No Significant Impact was published in the *Federal Register* date on **date (citation)**. Accordingly, based upon the environmental assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

VI. CONCLUSION

The Dresden ITS provide clearer, more readily understandable requirements to ensure safe operation of the plant. The NRC staff concludes that they satisfy the guidance in the Commission's policy statement with regard to the content of TS and conform to the model provided in NUREG-1433 with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the Dresden ITS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36, and other applicable standards. On this basis, the NRC staff concludes that the proposed Dresden ITS are acceptable.

The NRC staff has also reviewed the plant-specific changes to CTS as described in this evaluation. On the basis of the evaluations described herein for each of the changes, the NRC staff concludes that these changes are acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the

Commission's regulations; and, (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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CTS Discussion of Change Tables

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	1.1	1.0, 4.3.A.2
A.2	The definitions of CHANNEL, FUEL DESIGN LIMITING RATIO (FDLRX), LIMITING CONTROL ROD PATTERN (LCRP), PHYSICS TESTS, REPORTABLE EVENT, SOURCE CHECK, and TRIP SYSTEM are deleted since specific Specifications referring to them no longer contain their use, or no longer are retained in the Dresden 2 and 3 ITS.	N/A (CHANNEL CALIBRATION,)	1.0
A.3	Revises the wording for the definitions of CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST AND LOGIC SYSTEM FUNCTIONAL TEST to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" sensor, alarm, or channel failure trip function, and conversely, some channels may have a "required" display or interlock function. Also, combining the separate definition/requirement for analog and bistable channels, and the phrase "or actual," in reference to the injected signal for the CHANNEL FUNCTIONAL TEST, has been added as an explicit option to the currently required simulated signal.	1.1 CHANNEL FUNCTIONAL TEST, and LOGIC SYSTEM FUNCTIONAL TEST definitions	1.0
A.4	Revises the wording for the definition of CHANNEL CALIBRATION to clarify requirements for thermocouples and RTDs. The intent of a CHANNEL CALIBRATION is to adjust the channel output so that the channel responds with known range and accuracy. Most instrument channels contain an adjustable transmitter (sensor) which is also subject to drift. The appropriate calibration at the Frequencies specified in the Dresden 2 and 3 ITS would consist of a verification of OPERABILITY of the sensing element and a calibration of the remaining adjustable devices in the channel. Calibration of the adjustable devices in the channel is performed by applying the sensing elements' (RTDs or thermocouples) fixed input/output relationships to the remainder of the channel and making the necessary adjustments to ensure range and accuracy.	1.1 CHANNEL CALIBRATION definition	1.0
A.5	Incorporates the current definition of CRITICAL POWER RATIO into the proposed definition of MINIMUM CRITICAL POWER RATIO.	1.1 MINIMUM CRITICAL POWER RATIO definition	1.0

A.6	Deletes the definition of FREQUENCY NOTATION since the abbreviations in Table 1.1 are no longer used; SR Frequencies in the Dresden 2 and 3 ITS are directly specified.	N/A	1.0, Table 1.1
A.7	Combines the current definitions for IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE into one proposed defined term: LEAKAGE.	1.1 LEAKAGE definition	1.0
A.8	Provides clarifications: 1) as specified in the second portion of the current definition of IDENTIFIED LEAKAGE (proposed LEAKAGE definition), the intended leakage is that which occurs into the drywell space (i.e., containment atmosphere); and 2) the "collection systems" specified in the first portion of the definitions are intended to be those for collection of leakages into the drywell space.	1.1 LEAKAGE definition	1.0
A.9	Moves the definition of OFFSITE DOSE CALCULATION MANUAL to ITS 5.5.1.	5.5.1	1.0
A.10	Replaces OPERATIONAL MODE with the ITS definition of MODE. Clarifying statements are added to indicate that defined MODES in ITS Table 1.1-1 apply only when fuel is in the reactor vessel and that reactor vessel head closure bolt tensioning is a parameter.	1.1 MODE definition	1.0
A.11	Deletes the definitions of PRIMARY CONTAINMENT INTEGRITY and SECONDARY CONTAINMENT INTEGRITY; all the requirements are specifically addressed in the LCOs for the Primary Containment and Secondary Containment, along with the remainder of the LCOs in the Containment Systems Section.	N/A	1.0
A.12	Moves the definition of PROCESS CONTROL PROGRAM to the Administrative Controls Chapter (Chapter 5.0).	5.0	1.0
A.13	Modifies the definition of SHUTDOWN MARGIN to address stuck control rods, consistent with the Dresden 2 and 3 CTS requirement found in CTS 4.3.A.2 to account for the worth of a stuck control rod.	1.1 SHUTDOWN MARGIN definition	1.0, 4.3.A.2

A.14	Adds definitions of STAGGERED TEST BASIS and TURBINE BYPASS SYSTEM RESPONSE TIME consistent with their usage throughout the Dresden 2 and 3 ITS.	1.1 STAGGERED TEST BASIS and TURBINE BYPASS SYSTEM RESPONSE TIME definitions	N/A
A.15	Moves CTS Table 1.2, footnotes (a), (b), and (c) to LCO requirements in the Special Operations Section.	3.10.1, 3.10.2, 3.10.3	Table 1.2 footnotes (a), (b), (c)
A.16	Deletes CTS Table 1.2, footnote (d), which references Special Test Exceptions 3.12.A, 3.12.B, and 3.12.C.	N/A	Table 1.2 footnote (d)
A.17	The intent of applying the MODE definition only when fuel is in the vessel, as specified in CTS Table 1.2, footnote (c), has been moved to the definition of MODE. In addition, since the vessel head can only be removed if the head closure bolts are less than fully tensioned, there is no purpose in including "or with the head removed."	1.1 MODE definition	Table 1.2 footnote (c)
A.18	Adds Sections 1.2, Logical Connectors, 1.3, Completion Times, and 1.4 Frequency, to the Technical Specifications to aid in the understanding and use of the new format and presentation style, and to establish positions not previously formalized.	1.2, 1.3, 1.4	N/A
A.19	Modifies the definition of REACTOR PROTECTION SYSTEM RESPONSE TIME to allow the associated time to be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.	1.1 REACTOR PROTECTION SYSTEM RESPONSE TIME definition	1.0

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised wording.	2.0	2.0
A.2	Moves requirements for the Limiting Safety System Settings to ITS Section 3.3.	3.3	2.2
A.3	Deletes the details contained in the Actions of CTS 2.1.A, 2.1.B, 2.1.C, and 2.1.D to comply with the requirements of Specification 6.7, since the ITS format does not include providing cross references. In addition, the reference to Specification 6.7 has been deleted since Specification 6.7 has been deleted from the Technical Specifications.	N/A	2.1.A, 2.1.B, 2.1.C, 2.1.D
A.4	Modifies CTS 2.1.B consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated August 3, 1999.	2.1.1.2	2.1.B

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	3.0	3.0, 4.0
A.2	Renumber the CTS 3.0 series to LCO 3.0.X and the CTS 4.0 series to SR 3.0.X.	3.0	3.0, 4.0
A.3	1) Replaces the phrase "Compliance with...is required" with the phrase "LCOs shall be met;" 2) Changes "OPERATIONAL MODE(s)" to "MODES;" 3) Changes "conditions specified therein" to "specified conditions in the Applicability;" and 4) Changes the phrase "that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specification 3.0.E" to "as provided in LCO 3.0.2 and LCO 3.0.7." (LCO 3.0.2 addresses the requirement of meeting the associated ACTIONS when not meeting a Limiting Condition for Operation. LCO 3.0.7 addresses another situation when an LCO requirement is allowed not to be met.)	LCO 3.0.1	3.0.A
A.4	1) Replaces the lead-in sentence "Noncompliance with a Specification shall exist when..." with "Upon discovery of a failure to meet an LCO..."; 2) Changes the phrase "restored" to "met or is no longer applicable;" 3) Changes "time intervals" to "Completion Time(s);" 4) Changes "ACTION requirements" to "Required Action(s);" 5) Adds exception to LCO 3.0.6 due to its inclusion in the Dresden 2 and 3 ITS; and 6) Adds the phrase "unless otherwise stated" consistent with current Dresden 2 and 3 TS exceptions found in a few LCOs to avoid potential misapplication of those requirements.	LCO 3.0.2	3.0.B
A.5	1) Replaces the phrase "except as provided in the associated ACTION requirements" with "and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS" to cover all potential possibilities that require entry into LCO 3.0.3; 2) Changes "OPERATIONAL MODE" to "MODE or other specified condition;" 3) Revises the times to reach each MODE to include the 1 hour allowed by CTS 3.0.C for initiating the shutdown. Also, the time represents the total time allowed from the entry into LCO 3.0.3, replacing the current presentation where each time is referenced as "the next," or "the subsequent;" 4) Changes the phrase "under the ACTION requirements...failure to meet the Limiting Condition for Operation" to "in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required," to specifically state that LCO 3.0.3 actions do not have to be completed; and 5) Changes "This specification is not applicable in OPERATIONAL MODE 4 or 5" to "LCO 3.0.3 is only applicable in MODES 1, 2, and 3."	LCO 3.0.3	3.0.C

A.6	1) Revises the phrase "This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS." to include "or that are part of a shutdown of the unit;" 2) Adds the sentence "LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3."	LCO 3.0.4	3.0.D
A.7	ITS LCO 3.0.6 is added to provide guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)).	LCO 3.0.6	N/A
A.8	ITS LCO 3.0.7 is added to provide guidance regarding the meeting of Special Operations LCOs in Section 3.10.	LCO 3.0.7	N/A
A.9	ITS SR 3.0.1 is constructed to more completely present the relationship between Surveillance Requirements and meeting the requirements of the LCO. The second sentence of ITS SR 3.0.1, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO," is proposed to clarify existing intent that is not explicitly stated. The concept (editorially rewritten) found in the first sentence of CTS 4.0.C, has been moved to the third sentence of ITS SR 3.0.1; "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO, except as provided in SR 3.0.3." The sentence "Surveillance Requirements do not have to be performed on inoperable equipment" is moved from the last sentence of CTS 4.0.C, to ITS SR 3.0.1. Since all LCOs do not deal exclusively with equipment OPERABILITY, a clarifying phrase is also added: "or variables outside specified limits."	SR 3.0.1	4.0.A, 4.0.C
A.10	"The specified Frequency for each Surveillance Requirement is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met," was added to clearly establish what constituted meeting the specified Frequency of each Surveillance Requirement. Also, the sentence "Exceptions to this Specification are stated in the individual Specifications" is added to acknowledge the explicit use of exceptions in various Surveillances.	SR 3.0.2	4.0.B

A.11	1) Changes "Entry into an OPERATIONAL MODE or other specified applicable condition" to "Entry into a MODE or other specified condition in the Applicability of an LCO."; 2) Rewords "...passage through or to OPERATIONAL MODE(s) as required to comply with ACTION requirements" to "entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit"; and 3) Adds the sentence "SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3."	SR 3.0.4	4.0.D
A.12	Moves the technical content of CTS 4.0.E to ITS 5.5.6.	5.5.6	4.0.E
A.13	ITS LCO 3.0.8 and ITS SR 3.0.5 have been added to reflect the use of the LCOs and SRs for dual unit sites.	LCO 3.0.8, SR 3.0.5	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.1	3/4.3.A
A.2	Changes the passive CTS 3.3.A Action 2 words of "verify...inserted," to the active ITS 3.1.1 Required Actions C.1 and D.1 "Initiate action to fully insert..."	3.1.1 Required Actions C.1 and D.1	3.3.A Action 2
A.3	Deletes redundant actions of CTS 3.3.A Actions 2 and 3, which require suspension of activities that could reduce the SDM, when the SDM is not within limits in MODES 3, 4, or 5. In MODES 3 and 4, the vessel head is bolted in place, and the only activity that can significantly reduce SHUTDOWN MARGIN (SDM) is control rod withdrawal, for which a Required Action that ensures control rods remain inserted is provided. In MODE 5, the only activities that can affect SDM are CORE ALTERATIONS and control rod withdrawal, for which Required Actions are provided to suspend CORE ALTERATIONS and ensure control rods remain inserted.	N/A	3.3.A Actions 2 and 3
A.4	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible).	3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5	3.3.A Actions 2 and 3
A.5	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5	3.3.A Actions 2 and 3
A.6	Enhances presentation by requiring actions to be immediately initiated to insert all required control rods (completing the actions as soon as possible) in lieu of current requirement to insert the required control rods in 1 hour (initiating the actions as soon as possible).	3.1.1 Required Action E.2	3.3.A Action 3
A.7	A specific completion time for the SDM test is proposed to clarify <u>when</u> "prior to or during the first startup" applies. Most SDM tests are performed as an in-sequence critical and, therefore, 4 hours after reaching criticality is provided in ITS SR 3.1.1.1 as a reasonable time to perform the required calculations and have appropriate verification completed.	SR 3.1.1.1	4.3.A.1

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	Replaces the activity referred to as "refueling" with "fuel movement within the reactor pressure vessel or control rod replacement," since the intent of the Surveillance Requirement is to perform the SDM test after in-vessel activities which could have altered SDM.	SR 3.1.1.1	4.3.A.1
A.9	Moves the CTS 4.3.A.2 requirement to perform an SDM test after finding a stuck control rod to ITS 3.1.3.	3.1.3	4.3.A.2
3.1.2, Reactivity Anomalies			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.2	3/4.3.B
A.2	Changes "reactivity equivalence of the difference" to "reactivity difference."	LCO 3.1.2, SR 3.1.2.1	3.3.B, 4.3.B
A.3	Adds a specific time for completing the reactivity anomaly surveillance to clarify <u>when</u> "during the first startup" the test must be performed. This test is performed by comparing the difference between the actual critical control rod configuration to the predicted critical control rod configuration as a function of cycle exposure while at steady state reactor power conditions. Therefore, "24 hours after reaching these conditions" is provided as a reasonable time to perform the required calculations and complete the appropriate verification, meeting the intent of the CTS.	SR 3.1.2.1	4.3.B.1
3.1.3, Control Rod OPERABILITY			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.3	4.3.A, 3/4.3.C, 3/4.3.D, 3/4.3.H, 3/4.3.I
A.2	Reorganized the Control Rod OPERABILITY Specification to include all conditions that can affect the ability of the control rods to provide the necessary reactivity insertion.	3.1.3	3/4.3.C
A.3	Adds a Note, "Separate Condition entry is allowed for each control rod," which is consistent with the intent of the CTS.	3.1.3 ACTIONS Note	3.3.C Actions

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	Adds a Note that allows for bypassing the RWM, if needed for continued operations. This note is informative in that the RWM may be bypassed at any time, provided the proper ACTIONS of CTS 3.3.L (ITS 3.3.2.1), the RWM Specification, are taken.	3.1.3 Required Actions A.1 and C.1	N/A
A.5	Replaces "being immovable, as a result of excessive friction or mechanical interference, or known to be untrippable" with the term "stuck," since details of potential mechanisms by which control rods may be stuck are not necessary for inclusion within the Condition.	3.1.3 Condition A	3.3.C Action 1, 4.3.A.2
A.6	Deletes redundant phrase exempting SR on inoperable control rods since inoperable control rods are already not required to meet this Surveillance (per CTS 4.0.D).	SR 3.0.1	4.3.C.1
A.7	Surveillance that "cross-references" other Surveillances is deleted since the listed Surveillances are required by other Specifications.	N/A	4.3.C.2
A.8	Deletes redundant provision allowing the directional control valves to be rearmed intermittently.	LCO 3.0.5	3.3.C Actions 1.a.2), 2.b, and 2.c footnote a, 3.3.H Action 1.b footnote b, 3.3.I Action 1.c footnote b
A.9	Moves the SDM allowance to the definition of SDM.	1.1 SHUTDOWN MARGIN definition	4.3.A.2
A.10	Presents the requirement that maximum control rod scram insertion time be ≤ 7 seconds in SR 3.1.3.4, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification.	SR 3.1.3.4	3.3.D
A.11	Deletes the definition of time zero since it is duplicative of the definition of time zero in other CTS and maintained in footnote (a) to ITS Table 3.1.4-1.	Table 3.1.4-1 footnote (a)	3.3.D
A.12	Adds new SR to require SRs in ITS 3.1.4 to be performed, since CTS 4.3.D, which provides the scram time testing requirements, is addressed in ITS 3.1.4.	SR 3.1.3.4	4.3.D

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.13	Presents the requirement that control rods be coupled to their drive mechanism in SR 3.1.3.5, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification.	SR 3.1.3.5	3.3.H
A.14	Deletes CTS 3.3.H Action 1.a, which specifies the method of restoring coupling integrity to an uncoupled control rod. ITS does not explicitly detail options to "restore...to OPERABLE." This action is always an option, and is implied in the ITS ACTIONS.	LCO 3.0.2	3.3.H Action 1.a
A.15	The separate Specification for control rod position is captured by the requirement that each control rod have at least one control rod position indication in SR 3.1.3.1.	SR 3.1.3.1	3.3.I
A.16	Moves the requirements for control rod position indication during MODE 5 (refueling) to ITS 3.9.4.	3.9.4	3.3.I
	3.1.4, Control Rod Scram Times		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.4	4.3.D, 3/4.3.E, 3/4.3.F
A.2	Deletes a redundant provision that Specification 4.0.D is not applicable.	SR 3.0.4	4.3.D.2 footnote a
	3.1.5, Control Rod Scram Accumulators		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.5	3/4.3.G
A.2	Moves the control rod scram accumulator OPERABILITY MODE 5 requirements to ITS 3.9.5.	3.9.5	3/4.3.G
A.3	Adds ITS Note, "Separate Condition entry is allowed for each control rod scram accumulator," which is consistent with the intent of the CTS.	3.1.5 ACTIONS Note	3.3.G
A.4	The revised presentation of CTS 3.3.G Action ~~a~~1.a.1) does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.3.G Action ~~a~~1.a.1)

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Deletes the "default" action "be in at least HOT SHUTDOWN within the next 12 hours" as there are no circumstances which preclude the possibility of compliance with an ACTION to "Declare the control rod...inoperable."	N/A	3.3.G Action 1.~~a~~ b
A.6	Deletes the conditions which specify when the accumulator Surveillance does not have to be performed (i.e., when the associated control rod is inserted and disarmed or scrammed), since ITS ~~LCO~~ SR 3.0.1 provides the allowance.	~~LCO~~ SR 3.0.1	4.3.G
A.7	The method for verifying that a control rod drive pump is operating has been changed from inserting one control rod one notch to verifying that charging water header pressure is at least 940 psig. The proposed method for determining charging water header pressure provides added assurance that the charging water pressure is sufficient to insert all control rods, whereas the existing method only assures that one rod can be inserted.	3.1.5 ACTIONS B and C	3.3.G Action 1.c.1)
A.8	CTS 3.3.G Action 1.c is redundant to the Actions of CTS 3.3.C (ITS 3.1.3), and has therefore been deleted.	3.1.3 ACTIONS	3.3.G Action 1.c
	3.1.6, Rod Pattern Control		
NONE	NONE	NONE	NONE
	3.1.7, Standby Liquid Control System		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.7	3/4.4.A
A.2	Deletes the requirement to verify the "power operated or automatic" valves since the only "power operated or automatic" valves in the system is the explosive valve.	N/A	4.4.A.2.c
A.3	Revises the details of CTS 4.4.A.2.b, which identify the available boron concentration to be determined to be 14% to 16.5% by weight, to be within the limits of Figure 3.1.7-1 (SR 3.1.7.5).	SR 3.1.7.5 Figure 3.1.7-1	4.4.A.2.b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.1.8, SDV Vent and Drain Valves			
A.1	Editorial changes, reformatting, and revised numbering.	3.1.8	3/4.3.K
A.2	Clarifies that the signal used for performing CTS 4.3.K.3.a and 4.3.K.3.b can be an "actual or simulated" signal.	SR 3.1.8.3	N/A
Current Specification 3/4.3.J, Control Rod Drive Housing Support			
NONE	NONE	NONE	NONE
Current Specification 3/4.3.N, Economic Generation Control System			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE		
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.1	3/4.11.A
A.2	Deletes "OPERATIONAL MODE 1" from the Applicability of "OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.11.A
	3.2.2, MINIMUM CRITICAL POWER RATIO		
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.2	3/4.11.C
A.2	Deletes "OPERATIONAL MODE 1" from the Applicability of "OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.11.C
	3.2.3, LINEAR HEAT GENERATION RATE		
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.3	3/4.11.D
A.2	Deletes "OPERATIONAL MODE 1" from the Applicability of "OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.11.D
	3.2.4, AVERAGE POWER RANGE MONITOR GAIN AND SETPOINT		
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.4	3/4.11.B
A.2	Revises the LCO to provide the details which are specified in the CTS 3.11.B Actions for an allowance to adjust the flow biased APRM setpoints or to adjust each APRM gain when FDLRC is greater than 1.0.	3.2.4	3.11.B

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Deletes duplicate details of the FUEL DESIGN LIMITING RATIO FOR CENTERLINE MELT (FDLRC) definition in ITS Section 1.1.	N/A	3.11.B
A.4	Deletes "OPERATIONAL MODE 1" from the Applicability of "OPERATIONAL MODE 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.11.B
A.5	Revises the reference to the "setpoints" of the APRM Flow Biased Neutron Flux — High trip to "Allowable Value."	3.2.4 ACTION A	3.11.B Action 2

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.1.1	3/4.1.A, 2.2
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel" and revises the wording for CTS Actions 1, 2 and 3 ("One or more required channels" and "One or more Functions"), which is consistent with the intent of the CTS.	3.3.1.1 ACTIONS Note 1, 3.3.1.1 ACTIONS A, B, and C	3.1.A Actions
A.3	These changes to CTS 3/4.1.A are provided in the Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.1.1 ACTIONS A, B, C, and D, Surveillance Requirements Note 2, SR 3.3.1.1.5, SR 3.3.1.1.11, SR 3.3.1.1.12	3/4.1.A
A.4	RPS trip capability not maintained replaces the explicit reference to Functional Units 1 through 12 in CTS 3.1.A Actions 1 and 2 have been deleted. Each of these Functional Units are automatically actuated when the parameter exceeds the associated trip setpoint and since each of these Functions include four redundant channels and the loss of one channel in each trip system does not result in a loss of function. In addition, the explicit reference in CTS 3.1.A Action 3 to Functional Units 13 or 14 have been deleted, since Functions (Reactor Mode Switch Shutdown Position and Manual Scram) do not include four redundant channels, thus ITS 3.3.1.1 ACTION C (RPS trip capability not maintained) is required when any of the associated channels are found to be inoperable.	N/A	3.1.A Actions 1, 2, and 3
A.5	Moves the CTS Table 3.1.A-1 footnote (g) and CTS Table 4.1.A-1 footnote (m) requirement that the APRM Functional Units 2.a and 2.d be Operable during shutdown margin demonstrations performed per Specification 3.12.B to ITS 3.10.7.	3.10.7	Table 3.1.A-1 footnote (g), Table 4.1.A-1 footnote (m)

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

A.6	CTS Table 3.1.A-1 footnote (f) and CTS Table 4.1.A-1 footnote (i) state that the Reactor Vessel Steam Dome Pressure — High Function (Functional Unit 3) is not required to be OPERABLE in MODE 2 when the reactor vessel head is removed per CTS 3.12.A. CTS Table 3.1.A-1 footnote (h) and CTS Table 4.1.A-1 footnote (n) state that the Drywell Pressure — High Function (Functional Unit 7) is not required to be OPERABLE in MODE 2 when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.1.A-1 and 4.1.A-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.1.A-1 footnotes (f) and (h), Table 4.1.A-1 footnotes (i) and (n)
A.7	All MSIV channels are required to be OPERABLE to assure a scram with the worst case single failure. In the ITS, each MSIV contact is viewed as a separate channel (a total of 16 channels). Therefore, the minimum number of channels per trip system is more appropriately specified as "8" in Function 5 of ITS Table 3.3.1.1-1.	Table 3.3.1.1-1 Function 5	Table 3.1.A-1 Functional Unit 5
A.8	These changes to CTS 3/4.1.A and 2.2.A are provided in the Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter PSLTR 00-0054, dated February 18, 2000.	N/A	3/4.1.A, 2.2.A
A.9	Removes the cross references to the Special Operations LCOs due to the change described in DOC L.4 for ITS 3.3.1.1.	N/A	Table 3.1.A-1 footnote (i), Table 4.1.A-1 footnote (j)
A.10	Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs. ~~Changes to instrument setpoint values are addressed in other DOCs.~~	Table 3.3.1.1-1	2.2.A, 2.2.A Action, Table 2.2.A-1
A.11	~~Not used~~ Insert A.11	3.3.1.1 Required Action H.1	
A.12	Removes the CHANNEL FUNCTIONAL TEST Surveillance Frequency of "S/U" and footnote (c) of CTS Table 4.1.A-1 for Functional Units 1.a and 2.a "within 24 hours before startup, if not performed within the previous 7 days." These notations are redundant to the requirements of proposed SR 3.0.4, which requires the periodic weekly Surveillances to be performed and current prior to entry into the applicable operational conditions.	SR 3.0.4	Table 4.1.A-1 Functional Units 1.a and 2.a Frequency and footnote (c)

NRC See Comment 1

Table 3.1.A-1 Actions 13 and 19

INSERT A.11

Enhances presentation by requiring actions to be immediately initiated to insert control rods (completing the actions as soon as possible) in lieu of current requirement to insert the control rods in 1 hour (initiating the actions as soon as possible).

A.13	Deletes the daily (D - 24 hours) CHANNEL CHECK Frequency for CTS Table 4.1.A-1 Functional Unit 2.b, since it is already covered by the shiftly (S - 12 hours) CHANNEL CHECK Frequency of Table 4.1.A-1 Functional Unit 2.b.	N/A	4.1.A.1 for Table 4.1.A-1 Functional Unit 2.b
A.14	The CTS Limiting Safety System Settings (Setpoints) Table 2.2.A-1 has been combined with the current RPS Technical Specification (CTS 3/4.1.A). The information in CTS Table 2.2.A-1 is located in ITS Table 3.3.1.1-1.	3.3.1.1, Table 3.3.1.1-1	Table 2.2.A-1, 3/4.A.1
A.15	Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero.	Table 3.3.1.1-1 Function 4	Table 2.2.A-1 Functional Unit 4
	3.3.1.2, SRM Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.1.2	3/4.2.G, 3/4.10.B
A.2	CTS requirements to "verify all insertable control rods...inserted," are replaced in ITS 3.3.1.2 Required Action D.1 with an equivalent but more definitive requirement to "Fully insert...."	3.3.1.2 Required Action D.1	3.2.G Action 2
A.3	Adds a Note to the Surveillance Requirements to provide direction for proper application of the Surveillance Requirements for Technical Specification compliance.	3.3.1.2 Surveillance Requirements Note	N/A
A.4	Adds to the CTS 3.10.B Action the phrase, "except for control rod insertion," CTS and ITS definition of a CORE ALTERATION also includes control rod insertion and to comply with the CTS action to suspend CORE ALTERATIONS means to stop any <u>additional</u> CORE ALTERATIONS but not control rod insertion.	3.3.1.2 ACTION E	3.10.B Action
	3.3.2.1, Control Rod Block Instrumentation		

A.1	Editorial changes, reformatting, and revised numbering.	3.3.2.1	3/4.2.E, 3/4.3.L, 3/4.3.M
A.2	Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.2.1-1	3.2.E, 3.2.E Action 1, Table 3.2.E-1
A.3	The reference to "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 30% of RATED THERMAL POWER" is not used in the ITS. In both the CTS and ITS with THERMAL POWER ≥ 30% RTP, the unit will always be in MODE 1 (Operational Condition 1). In addition, CTS Tables 3.2.E-1 and 4.2.E-1 footnotes (e) and (d), respectively and LCO 3.3.M (ITS Table 3.3.2.1-1 Note (a)) have been modified to not require the RBM to be Operable when a peripheral control rod is selected, since this Note explains the RBM design feature which includes an automatic bypass when a peripheral rod is selected.	Table 3.3.2.1-1 Functions 1.a, 1.b, and 1.c, and Note (a)	Tables 3.2.E-1 and 4.2.E-1 Functional Units 1.a, 1.b, and 1.c, including footnotes ~~(d)~~ (e) and ~~(e)~~ (d) respectively, 3.3.M
A.4	These changes to CTS 3/4.2.E are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.2.1 Surveillance Requirements Note 2, SR 3.3.2.1.1	3/4.2.E
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.2.2	3/4.2.J
A.2	Replaces the term "Trip Setpoint" with "Allowable Value," since current plant practice uses the Trip Setpoint as the Operability limit (i.e., consistent with the use of the term "Allowable Value" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	SR 3.3.2.2.4	3.2.J, 3.2.J Action, Table 3.2.J-1
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.2.2 ACTIONS Note	3.2.J Actions

Table 3.2.F-1 Instrumentation 2

A.4	These changes to CTS 3/4.2.J are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.2.2 ACTIONS A, B, and C, 3.3.2.2 Surveillance Requirements Note	3/4.2.J
A.5	Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero.	SR 3.3.2.2.4	Table 3.2.J-1 Functional Unit
	3.3.3.1, Post Accident Monitoring Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.3.1	3/4.2.F
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each Function," which is consistent with the intent of the CTS.	3.3.3.1 ACTIONS Note 2	3.2.F Actions
A.3	~~Not used.~~ INSERT A.3	Table 3.3.3-1 Functions 2.a and 2.b	
A.4	Moves the details concerning the technical content of the Special Report specified in CTS 3.2.F-1 Action 61.b) to ITS 5.6.	5.6	Table 3.2.F-1 Action 61.b
	3.3.4.1, ATWS-RPT Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.4.1	3/4.2.C
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.4.1 ACTIONS Note	3.2.C Actions
A.3	These changes to CTS 3/4.2.C are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.4.1 Surveillance Requirements Note	3/4.2.C

NRC See Comment 2

A.4	Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	SR 3.3.4.1.4	3.2.C, 3.2.C Action, Table 3.2.C-1
A.5	Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero.	SR 3.3.4.1.4	Table 3.2.C-1 Functional Unit 1
	3.3.5.1, ECCS Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.5.1	3/4.2.B
A.2	Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.5.1-1	3.2.B, 3.2.B Action 1, Table 3.2.B-1
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.1 ACTIONS Note	3.2.B Actions
A.4	Modifies the reference point for the Reactor Vessel Water Level - Low Low and Reactor Vessel Water Level - High Functions from top of active fuel to instrument zero.	Table 3.3.5.1-1 Functions 1.a, 2.a, 3.a, 3.c, 4.a, and 5.a	Table 3.2.B-1 Functional Units 1.a, 2.a, 3.a, 3.e, 4.a, and 5.a
A.5	Not used.	N/A	N/A
A.6	CTS Table 3.2.B-1 footnote (f) and CTS Table 4.2.B-1 footnote (d) state that the Drywell Pressure—High Function (Functional Units 1.b, 2.b, 3.b, 4.b, and 5.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.B-1 and 4.2.B-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.2.B-1 footnote (f), Table 4.2.B-1 footnote (d)
A.7	The detail in CTS Table 3.2.B-1 Functional Unit 3.g, HPCI Manual Initiation, that there is one channel "per system" has been deleted since there is only one HPCI System per unit.	N/A	Table 3.2.B-1 Functional Unit 3.g

A.8	These changes to CTS 3/4.2.B are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.5.1 ACTIONS B, C, D, E, F, G, and H, 3.3.5.1 Surveillance Requirements Note 2, SR 3.3.5.1.2	3/4.2.B
A.9	Moves the technical content of the loss of power instrumentation requirements of CTS Table 3.2.B-1 Functional Units 6.a and 6.b, including Action 36 and footnotes (e), (g), and (j), and CTS Table 4.2.B-1, Functional Units 5.a and 5.b, including footnote (c), to ITS 3.3.8.1, "Loss of Power Instrumentation."	3.3.8.1	Table 3.2.B-1 Functional Units 6.a and 6.b including Action 36 and footnotes (e), (g), and (j), CTS Table 4.2.B-1, Functional Units 5.a and 5.b, including footnote (c)
A.10	Adds a Required Action to allow the HPCI pump suction to be aligned to the suppression pool in lieu of tripping the channel, if a Condensate Storage Tank Level—Low or Suppression Pool Water Level—High channel is inoperable. This allowance manually performs the instrumentation function.	3.3.5.1 Required Action D.2.2	Table 3.2.B-1 Action 35
A.11	Replaces the CHANNEL FUNCTIONAL TEST of Table 4.2.B-1 Functional Unit 3.g (the HPCI Manual Initiation Function) with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.5.1, which is a complete test of the logic, including the Manual Initiation switch, and is performed at the same Frequency.	N/A	4.2.B.1 for Table 4.2.B-1 Functional Unit 3.g

A.12	Deletes the specific CHANNEL FUNCTIONAL TEST requirement for Functional Unit 4.c, ADS Initiation Timer, and Functional Unit 4.d, ADS Low Low Level Timer, since the CFT is included in the CTS and ITS definition of CHANNEL CALIBRATION and the CFT and the CHANNEL CALIBRATION are performed at the same Frequency.	N/A	4.2.B.1 for Table 4.2.B-1 Functional Units 4.c and 4.d
A.13	Not used.		
A.14	CTS Table 4.2.B-1 Functional Unit 3.e, HPCI Reactor Vessel Water Level — High (Trip), identifies the CHANNEL CHECK as "NA". Proposed ITS Table 3.3.5.1-1 Function 3.c, will include a CHANNEL CHECK in accordance with SR 3.3.5.1.1, at a Frequency of 12 hours. This requirement is being added consistent with the requirements currently identified for CTS Functional Units 1.a, 2.a, 3.a, and 4.a, since each of these Functional Units are associated with the same level instrumentation. Although this change identifies an additional requirement and may be considered more restrictive, since it is consistent with the current plant procedures, it is considered administrative.	SR 3.3.5.1.1	N/A
A.15	These changes to CTS 3/4.2.B are provided in the Dresden 2 and 3 ITS consistent with the Technical Specification Change Request submitted to the NRC for approval per ComEd letter PSLTR #00-0056, dated February 21, 2000.	Table 3.3.5.1-1 Function 3.d	3/4.2.B
	3.3.5.2, IC System Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.5.2	3/4.2.D
A.2	Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	SR 3.3.5.2.2	3.2.D, 3.2.D Action 1, Table 3.2.D-1
A.3	The ITS does not include a CHANNEL CHECK requirement since CTS Table 4.2.D-1 has "NA" in the CHANNEL CHECK column.	N/A	Table 4.2.D-1 Functional Unit
A.4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.2 ACTIONS Note	3.2.D Actions

A.5	Changes the column title to be on a per Function basis in ITS LCO 3.3.5.2 rather than the per Trip System basis in CTS Table 3.2.D-1. Thus, the number of required channels for CTS Table 3.2.D-1 Functional Unit (Reactor Vessel Pressure—High) is changed to "4", since there are two trip systems for this Functional Unit, with two channels per trip system.	LCO 3.3.5.2	Table 3.2.D-1 Functional Unit
A.6	These changes to CTS 3/4.2.D are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.5.2 ACTIONS A and B, 3.3.5.2 Surveillance Requirements Note	3/4.2.D
	3.3.6.1, Primary Containment Isolation Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.1	3/4.2.A
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," and revises the wording for CTS Action 2 ("One or more channels" and "One or more automatic Functions"), which is consistent with the intent of the CTS.	3.3.6.1 ACTIONS Note and ACTIONS A and B	3.2.A Action 2
A.3	These changes to CTS 3/4.2.A are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.6.1 ACTIONS A, B, and C, 3.3.6.1 Surveillance Requirements Note 2, SR 3.3.6.1.2, SR 3.3.6.1.3	3/4.2.A
A.4	CTS Table 3.2.A-1 footnote (d) and CTS Table 4.2.A-1 footnote (b) state that the Drywell Pressure—High Function (Functional Unit 1.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.A-1 and 4.2.A-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.2.A-1 footnote (d), Table 4.2.A-1 footnote (b)

INSERT A.3

The Reactor Vessel Water Level instrumentation in CTS Table 3.2.F-1 consists of instruments with different ranges to satisfy Regulatory Guide 1.97 requirements. The different ranges are: "medium range" covering approximately 83 inches above the top of active fuel to approximately 203 inches above the top of active fuel; and "fuel zone (wide range)" covering approximately 203 inches above the top of active fuel to approximately 197 inches below the top of active fuel. Currently, CTS Table 3.2.F-1 only specifies requirements for two channels but does not specify the required ranges. Using the ITS format, the instruments required to cover these ranges are delineated in ITS Table 3.3.3.1-1 as separate line items under Function 2, with each channel consisting of only one instrument. Therefore, ITS Table 3.3.3.1-1 Function 2.a (Reactor Vessel Water Level - Fuel Zone (Wide Range)) and Function 2.b (Reactor Vessel Water Level - Medium Range) will each specify requirements for two channels (for a total of 4 channels).

A.5	Moves the requirements identified in CTS Tables 3.2.A-1 and 4.2.A-1 related to Secondary Containment Isolation (as described in footnotes (c), (d), *, and ** to Table 3.2.A-1 and footnotes (b), (c), *, and ** to Table 4.2.A-1) to ITS 3.3.6.2, "Secondary Containment Isolation Instrumentation."	3.3.6.2	Tables 3.2.A-1 (including footnotes (c), (d), *, and **) and 4.2.A-1 (including footnotes (b), (c), *, and **)
A.6	Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.6.1-1	3.2.A, 3.2.A Action 1, Table 3.2.A-1
A.7	The CTS action to "declare the affected system inoperable" is deleted since this instruction is essentially a "cross reference" between Technical Specifications.	N/A	Table 3.2.A-1 Action 23
A.8	Replaces the CHANNEL FUNCTIONAL TEST of Table 4.2.A-1 Functional Unit 4.a, Standby Liquid Control (SLC) System Initiation, with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.6.1, which is a complete test of the logic, including the switches, and is performed at the same Frequency.	SR 3.3.6.1.7	4.3.2.1 for Table 4.2.A-1 Functional Unit 4.a
A.9	CTS Table 3.2.A-1 footnote (e) for Functional Unit 7.b (Recirculation Line Water Temperature – High) states that "only one TRIP SYSTEM" is provided. The provisions of footnote (e) are not retained in the ITS. The two required channels provide inputs to a single trip string which in turn provides input to two trip systems and is adequately described in the Bases.	N/A	Table 3.2.A-1 footnote (e)
A.10	CTS Table 3.2.A-1 requires Functional Unit 3.e, Main Steam Line (MSL) Tunnel Temperature—High, to have at least 2 channels (of the 4) in each of 2 sets OPERABLE per trip system. In the ITS, this requirement is clarified by replacing the words "2 of 4 in each of 2 sets" with "2 per trip string" such that the requirement is consistent with the terminology used in BWR ISTS, NUREG-1433, Rev. 1, for describing other similar trip logic schemes.	Table 3.3.6.1-1 Function 1.e	Table 3.2.A-1 Functional Unit 3.e
A.11	Modifies the reference point for the Reactor Vessel Water Level - Low and Reactor Vessel Water Level - Low Low Functions from top of active fuel to instrument zero.	Table 3.3.6.1-1 Functions 1.a, 2.a, 5.b, and 6.b	Table 3.2.A-1 Functional Units 1.a, 3.a, 4.b, and 7.a

3.3.6.2, Secondary Containment Isolation Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.2	3/4.2.A, 4.7.P.4.b.2)
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," and revises the wording for CTS Action 2 ("One or more channels" and "One or more automatic Functions"), which is consistent with the intent of the CTS.	3.3.6.2 ACTIONS Note and ACTIONS A and B	3.2.A Action 2
A.3	These changes to CTS 3/4.2.A are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter JMHLTR 00-0002, dated January 11, 2000.	3.3.6.2 ACTIONS A, B, and C, 3.3.6.2 Surveillance Requirements Note 2, SR 3.3.6.2.2, SR 3.3.6.2.3	3/4.2.A
A.4	The CTS replaces the use of the term SECONDARY CONTAINMENT INTEGRITY with the elements of that term and clarifies the need to isolate SCIVs and start the associated SGT subsystem(s).	3.3.6.2 Required Actions C.1.1 and C.2.1	Table 3.2.A-1 Action 24
A.5	CTS Table 3.2.A-1 footnote (d) and CTS Table 4.2.A-1 footnote (b) state that the Drywell Pressure—High Function (Functional Unit 2.b) is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3/4.12.A is being used). These notes are deleted from CTS Tables 3.2.A-1 and 4.2.A-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.2.A-1 footnote (d), Table 4.2.A-1 footnote (b)
A.6	Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.6.2-1	3.2.A, 3.2.A Action 1, Table 3.2.A-1
A.7	Modifies the reference point for the Reactor Vessel Water Level - Low Function from top of active fuel to instrument zero.	Table 3.3.6.2-1 Function 1	Table 3.2.A-1 Functional Unit 2.a

	3.3.6.3, Relief Valve Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.3	3/4.6.F
A.2	Replaces the term "Setpoints" with "Allowable Values," since current plant practice uses the Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.6.3-1 Functions 1.a and 2.a	3.6.F
A.3	Adds a Note to provide direction for proper application of the Surveillance Requirements to ensure Technical Specification compliance, consistent with the intent of the CTS.	3.3.6.3 Surveillance Requirements Note	4.~~7~~.F 6
A.4	Deletes the CTS 4.6.F.1.a CHANNEL FUNCTIONAL TEST requirement since it is redundant to the CTS 4.~~7~~.F.1.b LOGIC SYSTEM FUNCTIONAL TEST requirement performed at the same Frequency. 6	SR 3.3.6.3.2	4.~~7~~.F.1.a
	3.3.7.1, CREV System Instrumentation		
NONE	NONE	NONE	NONE
	3.3.8.1, Loss of Power Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.8.1	3/4.2.B
A.2	A new LCO, ITS 3.3.8.1, has been written specifically for the Loss of Power (LOP) Instrumentation. The LOP Function from the current ECCS instrumentation Specification (CTS 3/4.2.B) is incorporated into this LCO. ITS 3.3.8.1 requires the instruments listed in ITS Table 3.3.8.1-1 to be OPERABLE, and the Table has the appropriate Functions from CTS Table 3.2.B-1 listed.	3.3.8.1	3/4.2.B
A.3	Replaces the term "Trip Setpoints" with "Allowable Values," since current plant practice uses the Trip Setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	Table 3.3.8.1-1	3.2.B, 3.2.B Action 1, Table 3.2.B-1

A.4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.8.1 ACTIONS Note	3.2.B Actions
A.5	Deletes references to "take the ACTION required by..." in CTS Table 3.2.B-1 Action 36, since the format of the ITS does not include providing "cross references." The individual Specifications adequately prescribe the Required Actions for inoperable systems, subsystems, trains, components, and devices without such references.	N/A	Table 3.2.B-1 Action 36
A.6	These changes to CTS Table 3.2.B-1 are provided in Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd Letter dated January 11, 2000.	Note 2 to Surveillance Requirements	Table 3.2.B-1, Note (a)
3.3.8.2, RPS Electric Power Monitoring			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.8.2	3/4.9.G
A.2	The revised presentation of CTS 3.9.G Actions 1 and 2 does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.9.G Actions 1 and 2
A.3	A new ACTION is provided that requires a shutdown if the Required Actions of Condition A or B are not met when the unit is in MODE 1, 2, or 3. This action is functionally equivalent to the CTS 3.0.C, which is currently required if CTS 3.9.G Actions 1 and 2 are not met (although CTS 3.0.C does provide an additional 1 hour to commence the shutdown).	3.3.8.2 ACTION C	3.9.G Actions 1 and 2
A.4	Replaces the term "setpoints" with "Allowable Values," since current plant practice uses the setpoints as the Operability limit (i.e., consistent with the use of the term "Allowable Values" in the ITS). Changes to instrument setpoint values are addressed in other DOCs.	SR 3.3.8.2.2	4.9.G.2
Current Specification 3/4.2.H, Explosive Gas Monitoring			
NONE	NONE	NONE	NONE
Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation			

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

NONE	NONE	NONE	NONE

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, Recirculation Loops Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.1	3/4.6.A, 3/4.6.C
A.2	CTS 3.6.A has been rewritten into two distinct options, with the first option requiring two recirculation loops and the second option only requiring one recirculation loop with the added requirements of CTS 3.6.A ACTIONS 1.b, 1.c and 1.d. Similarly, the Applicability of CTS 3.6.C has been changed from OPERATIONAL MODE(s) 1 and 2 during two loop operation to MODES 1 and 2 (ITS 3.4.1) since the first option in proposed ITS LCO 3.4.1 requires two recirculation loops with match flows to be in operation.	3.4.1, 3.4.1 ACTION C	3.6.A ACTIONS 1.b, 1.c, and 1.d, 3.6.C
A.3	Deletes the requirement to increase the MCPR safety limit per CTS 2.1.B when only one recirculation loop is in operation, since the Safety Limit requirement is currently specified as the single loop limit; thus, when the plant is in single loop, the limit applies immediately, not in 24 hours as allowed by CTS 3.6.A Action 1.a.	N/A	3.6.A Action 1.a
A.4	Deletes the requirement to reduce the Average Power Range Monitor (APRM) Rod Block Trip Setpoints since this function has been relocated to the Technical Requirements Manual. In addition, deletes reference to APRM Flow Biased Neutron Flux Scram and RBM Trip Setpoints since the trip setpoints are an operational detail.	N/A	3.6.A Action 1.c
A.5	Deletes the requirement to restore the recirculation pump speeds to within the limits if they are not within the limits. ITS does not explicitly detail options to "restore...to within the specified limit" when an alternate ACTION is provided that allows continued operation.	3.4.1 ACTION B	3.6.C Action 1
A.6	Deletes CTS 3.6.C Action 2, referencing CTS 3.6.A.1, since the statement only serves as a cross reference.	N/A	3.6.C Action 2
	3.4.2, Jet Pumps		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.2	3/4.6.B
A.2	Revises the wording in CTS 4.6.B.1 and CTS 4.6.B.2 (ITS SR 3.4.2.1) to require verification that one of the criteria be met, rather than require verification that no two of the conditions exist.	SR 3.4.2.1	4.6.B.1, 4.6.B.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

3.4.3, Safety and Relief Valves			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.3	3/4.6.E, 3/4.6.F
A.2	Revises the organization of the Safety and Relief Valves requirements of CTS 3/4.6.E and CTS 3/4.6.F, respectively, to be included within one Specification in the ITS (ITS 3.4.3).	3.4.3	3/4.6.E, 3/4.6.F
A.3	Not used.	N/A	N/A
A.4	Adds SR 3.4.3.2 to ensure the relief valves open when manually actuated and SR 3.4.3.3 to ensure that the relief valves will actuate on an actual or simulated automatic initiation signal, which are consistent with current testing requirements in CTS 4.5.A.4.a and 4.5.A.4.b.	SR 3.4.3.2, SR 3.4.3.3	N/A
A.5	(Unit 2) Revises CTS LCO 3.6.E to reduce the number of safety valves required to be OPERABLE consistent with the Technical Specifications change submitted to the NRC for approval per the ComEd License Amendment Request letter PSLTR 00-0061, dated February 29, 2000.	3.4.3	3.6.E
3.4.4, RCS Operational Leakage			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.4	3/4.6.H
A.2	Editorially changes "any 24 hour period" to "the previous 24 hour period."	3.4.4.c, 3.4.4.d	3.6.H.2, 3.6.H.4, 3.6.H Action 3
A.3	Moves the CTS 4.6.H.1 requirement for sampling of primary containment particulate and the associated footnote(a) to ITS 3.4.5.	3.4.5	4.6.H.1
A.4	Adds an option to reduce the leakage to within the limit in lieu of identifying the source as not IGSCC susceptible material, since restoring compliance with the LCO is always an option.	3.4.4 Required Action B.1	N/A
3.4.5, RCS Leakage Detection Instrumentation			

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

A.1	Editorial changes, reformatting, and revised numbering.	3.4.5	3/4.6.G, 4.6.H.1
A.2	Deletes the requirement in CTS 4.6.G.1 to perform the leakage determinations of CTS 4.6.H since it duplicates the requirement of CTS 4.6.H.2 (ITS SR 3.4.4.1).	N/A	4.6.G.1
A.3	Revises the words "drywell floor drain sump pump discharge flow integrator" in CTS 4.6.G.2 with the qualified detection system name, "drywell floor drain sump monitoring system," for clarification and to provide consistency with the proposed changes to the LCO and ACTIONS.	3.4.5	4.6.G.2
	3.4.6, RCS Specific Activity		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.6	3/4.6.J
	3.4.7, Shutdown Cooling System - Hot Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.7	3/4.6.O
A.2	Deletes allowance to remove the SDC loop from operation during hydrostatic tests since these tests are not performed in MODE 3.	N/A	3.6.O footnote (c)
A.3	Adds ITS Note "Separate Condition entry is allowed for each SDC subsystem" which is consistent with the intent of the CTS.	3.4.7 ACTIONS Note 2	N/A
A.4	Deletes the requirement to demonstrate every 24 hours the OPERABILITY of at least one alternate method capable of decay heat removal for each inoperable SDC loop. It is unnecessary since the Specification requires that reactor be in MODE 4 within 24 hours (which exits this Specification), and CTS 3.6.P and the ITS 3.4.8 both require the periodic verification of the availability of an alternate decay heat removal method.	N/A	3.6.O Action 1
A.5	Deletes the requirement which allows the unit to maintain reactor coolant temperature as low as practical in lieu of attaining MODE 4, when two SDC subsystems are inoperable and the unit is unable to attain MODE 4.	N/A	3.6.O Action 1 footnote (d)
	3.4.8, Shutdown Cooling System - Cold Shutdown		

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

A.1	Editorial changes, reformatting, and revised numbering.	3.4.8	3/4.6.P
A.2	Adds ITS Note "Separate Condition entry is allowed for each SDC subsystem" which is consistent with the intent of the CTS.	3.4.8 ACTIONS Note	3.6.P Actions
	3.4.9, RCS Pressure and Temperature (P/T) Limits		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.9	3/4.6.D, 3/4.6.K
A.2	Clarifies Actions to "perform an engineering evaluation..." and "determine if the Reactor Coolant System is acceptable for continued operation" with Notes that state the determination that the acceptability of the RCS for continued operation must be completed any time the requirements of the LCO are not met.	3.4.9 Conditions A and C Notes	3.6.K Action 2, 3.6.D Action
A.3	Changes the CTS Action to "restore...within 30 minutes" to "initiate action to restore ...Immediately" for conditions other than MODES 1, 2, and 3, which is consistent with the intent of the CTS.	3.4.9 Required Action C.1	3.6.K Action 1, 3.6.D Action
A.4	Deletes the reactor vessel material specimen Surveillance since it is a duplication of the regulations found in 10 CFR 50 Appendix H.	N/A	4.6.K.3
A.5	Adds Notes to clarify the current intent in CTS 4.6.K.4.a (periodic verification that reactor vessel flange and head flange temperatures are within limits) of allowing entry into the applicable conditions (i.e., ≤ 113°F and ≤ 93°F) without having performed these SRs.	SR 3.4.9.6, SR 3.4.9.7	N/A
A.6	Deletes the requirement to verify the reactor vessel and head flange temperatures within 30 minutes prior to tensioning of the head bolting studs, since it is duplicative of ITS SR 3.0.1.	N/A	4.6.K.4.b
A.7	The idle recirculation loop startup requirements have been combined into the RCS Pressure and Temperature Limits Specification, with the words "and the recirculation pump starting temperature requirements" added to the ITS 3.4.9 LCO statement. The actual description of the requirements and the limits are found in the Surveillance Requirements.	3.4.9 LCO	3.6.D
A.8	Deletes the requirement to monitor the temperature difference between an idle loop and an operating loop, since they are redundant to the loop-to-coolant requirement of CTS 3.6.D.1 (ITS SR 3.4.9.4).	N/A	3.6.D.2

A.9	Provides changes in the Dresden ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated February 23, 2000.	3.4.9	3/4.6.K
A.10	Deletes the CTS 3.6.K Action 1 detail that the applicable primary system coolant temperature rate of change limit cannot be exceeded while restoring the reactor vessel metal temperature and/or pressure to within the limits. CTS LCO 3.0.A (ITS LCO 3.0.1) requires compliance with the Limiting Conditions for Operation during the Operational Modes or other conditions specified	N/A	3.6.K Action 1
	3.4.10, Reactor Steam Dome Pressure		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.10	3/4.6.L
	Current Specification 3/4.6.N, Structural Integrity		
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS-Operating		
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.1	3/4.5.A
A.2	Deletes footnote (d), which provides a cross reference to CTS 3.9.A, since ITS 3.8.1 Required Action B.2 adequately prescribes the necessary actions when redundant required feature(s) are inoperable.	N/A	3.5.A Actions 2.a and 2.b footnote (d)
A.3	Revises CTS 4.5.A.2.c and 4.5.A.3.b.1) footnote (c) to allow the HPCI flow tests to be performed within 12 hours after adequate reactor steam pressure is available. In addition, CTS 4.5.A.4.b footnote (c) allows the ADS valve actuation test to be deferred until 12 hours after adequate reactor steam pressure is available. Adequate pressure to perform the tests also implies adequate flow must be available to perform the tests.	Note to SR 3.5.1.6, SR 3.5.1.7, and SR 3.5.1.10	4.5.A.2.c, 4.5.A.3.b.1) footnote (c), 4.5.A.4.b footnote (c)
A.4	Deletes the statements in CTS 3.5.A Actions 1, 2, 3 and 4 that require other ECCS equipment to be OPERABLE ("provided that.."). ITS 3.5.1 ACTION J provides direction for various interrelationships between ECCS subsystems and ADS. The ACTION requires entry into LCO 3.0.3 for various combinations of inoperable components, which is consistent with the present Actions for the same combinations.	3.5.1 ACTION J	3.5.A Actions 1, 2, 3 and 4
	3.5.2, ECCS-Shutdown		
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.2	3/4.5.B, 3/4.5.C
A.2	Rewords SRs such that the applicable SRs for low pressure ECCS and for HPCI are presented in the SRs for this Specification, versus referring to the SRs in ITS 3.5.1.	SR 3.5.2.2, SR 3.5.2.3, SR 3.5.2.4	4.5.B
A.3	~~Not used.~~ INSERT A.3	~~N/A~~ 3.5.2 ACTION D	~~N/A~~ 3.5.B Action 2, 3.5.C Action 2
A.4	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.5.2 ACTION D	3.5.B Action 2, 3.5.C Action 2

NRC See Comment 1

INSERT A.3

Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible).

A.5	Removes statement that the ECCS is not required to be OPERABLE provided "that the reactor vessel head is removed, the cavity is flooded," since the other requirements of the note can only be accomplished if the vessel head is removed and the cavity flooded.	N/A	3.5.B footnote (a), 3.5.C footnote (a)
A.6	Moves CTS 3.5.C.1 and associated Applicability, Action 1, and CTS 4.5.C.1 to ITS 3.6.2.2.	3.6.2.2	3.5.C.1, 3.5.C Action 1, 4.5.C.1
A.7	As an enhanced presentation of current intent, deletes CTS 4.5.C.2.b, which requires periodic verification that the specified conditions of Applicability footnote (a) are met when the suppression pool is inoperable.	N/A	4.5.C.2.b
A.8	Revises the suppression chamber water level of "≥ 8'" specified in CTS 3.5.C.2 and CTS 4.5.C.2.a to "≥ 10 ft 4 inches." This change is provided in the Dresden 2 and 3 ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per a ComEd letter, dated May 20, 1999.	3.5.2.1.a	3.5.C.2, 4.5.C.2.a
	3.5.3, IC System		
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.3	3/4.5.D

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, Primary Containment		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.1	3/4.7.A, 3.7.K.3, 4.7.K.5
A.2	Replaces the definition of PRIMARY CONTAINMENT INTEGRITY and the references to it in CTS 3/4.7.A with the requirement for primary containment to be OPERABLE, since all the requirements are specifically addressed in ITS 3.6.1.1 for the primary containment along with the remainder of the LCOs in the Primary Containment Section.	3.6.1.1, 3.6.1.2 3.6.1.3, 3.6.2.1, 3.6.2.2	3/4.7.A
A.3	Deletes the cross reference to CTS 3.12.A, since the format of the ITS does not include providing "cross references."	N/A	3.7.A Applicability footnote (a)
A.4	CTS 4.7.A.2 (including footnote (b)), relating to the position verification of PCIVs, has been moved to ITS 3.6.1.3.	3.6.1.3	4.7.A.2 including footnote (b)
A.5	Deletes Surveillance Requirements 4.7.A.3 and 4.7.A.4, which cross reference to the requirements for the air lock and the suppression chamber. Requirements for the air lock and suppression chamber remain within the ITS; however, providing a cross reference to them only adds confusion when evaluating compliance with Primary Containment OPERABILITY.	N/A	4.7.A.3, 4.7.A.4
A.6	The drywell-to-suppression chamber bypass leakage requirement of CTS 3.7.K.3 is presented as a supporting Surveillance for Primary Containment OPERABILITY.	SR 3.6.1.1.2	3.7.K.3
	3.6.1.2, Primary Containment Air Lock		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.2	3/4.7.C
A.2	Deletes the cross reference to CTS 3.12.A, since the format of the ITS does not include providing "cross references."	N/A	3.7.C Applicability footnote (a)

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

A.3	A Note is proposed to be added to the ITS to facilitate use and understanding of the intent of the ITS and are consistent with the intent of the CTS. ITS 3.6.1.2 ACTIONS Note 2 requires considering the primary containment inoperable in the event air lock leakage results in the acceptance criteria being not met. In addition, ITS 3.6.1.2 Required Action C.1 will ensure that the primary containment overall leakage is evaluated, against the acceptance criteria, if an air lock is inoperable.	3.6.1.2 ACTIONS Note 2, 3.6.1.2 Required Action C.1	3.7.C Actions
A.4	Adds ITS Required Action Note "Required Actions...are not applicable if...Condition C is entered", recognizing that if both doors in the air lock are inoperable, then an "OPERABLE" door does not exist to be closed (ITS 3.6.1.2 Required Actions A.1, A.2, A.3, B.1, B.2, and B.3 cannot be met).	3.6.1.2 Required Actions A and B Note 1	3.7.C Actions
A.5	The revised presentation of CTS 3.7.C Actions 1.a and 2 do not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.7.C Actions 1.a and 2
A.6	The requirement for performing the overall air lock leakage test is a requirement of 10 CFR 50 Appendix J, and this requirement is embodied in ITS SR 3.6.1.2.1. It is possible that the test would not be able to be performed with an inoperable air lock door, and a plant shutdown would be required due to the inability to perform the required Surveillance. However, this restriction on continued operation need not be specified (i.e., CTS 3.7.C Action 1.b is deleted) since it exists inherently as a result of the required Appendix J testing.	SR 3.6.1.2.1	3.7.C Action 1.b
	3.6.1.3, Primary Containment Isolation Valves ~~4.7.?~~		
A.1	Editorial changes, reformatting, and revised numbering. 4.7.A.2 including footnote (b)	3.6.1.3	~~3/4.7.A,~~ 3/4.7.D, (3) 3/4.6.M
A.2	Includes requirements for MSIVs in ITS 3.6.1.3, however, does not include requirements for the reactor building - suppression chamber vacuum breakers; they are retained in ITS 3.6.1.7. Therefore, the ITS LCO 3.6.1.3 statement excludes the OPERABILITY of the reactor building - suppression chamber vacuum breakers. In addition, since all requirements of MSIVs are included in ITS 3.6.1.3, the cross reference in CTS 3.7.D Action 1 footnote (b) to MSIVs is excluded.	LCO 3.6.1.3	3.7.D Action 1 footnote (b)

NRC Insert is more accurate

NRC
Not in DOC A.3

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path," which is consistent with the intent of the CTS.	3.6.1.3 ACTIONS Note 2	3/4.7.A, 3.7.D Actions, 3.6.M Actions
A.4	Adds ITS ACTIONS Notes to facilitate the use and understanding of the intent for a system made inoperable by inoperable PCIVs; i.e., that the applicable ACTIONS for that system also apply. This requirement is currently located in CTS 3.7.D Action 2.b, but it does not cover all situations. Therefore, ITS 3.6.1.3 ACTIONS Note 3 has been added to cover all situations. ITS 3.6.1.3 ACTIONS Note 4 clarifies that these "systems" include the primary containment.	3.6.1.3 ACTIONS Notes 3 and 4	3.7.D Action 2.b
A.5	CTS 3.7.D Action 1 and the CTS 3.6.M Action do not specify penetrations with one or two isolation valves. However, ITS 3.6.1.3 Condition A applies if the affected penetration has two valves, and only one is inoperable. This inherently ensures maintaining "at least one isolation valve OPERABLE." In the case of containment penetrations designed with only one isolation valve, the system boundary is considered an adequate barrier and the penetration is not considered "open" when the single isolation valve is open.	3.6.1.3 Condition A Condition C	3/4.7.A, 3.7.D Action 1, 3.6.M Action
A.6	The revised presentation of CTS 3.7.D Actions 1.a and 2.a and the CTS 3.6.M Action does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.7.D Actions 1.a and 2.a, 3.6.M Action
A.7	Deletes the phrase "power-operated" from the first part of 4.7.D.2, since the last part of 4.7.D.2 only requires each automatic isolation valve to be verified that it actuates to its isolation position. In addition, deletes the 4.7.D.2 testing requirement exclusion for the traversing in-core probe system explosive isolation valves, since they are not closed on an automatic signal.	N/A	4.7.D.2
A.8	Deletes the LCO 3.0.C statement in CTS 3.7.D Action 2 since it is redundant to the "Otherwise..." action. That is, LCO 3.0.C is not applicable anyway since a shutdown action has been provided.	N/A	3.7.D Action 2
A.9	Incorporate the requirements, provisions, actions, and associated restoration times for MSIVs into ITS 3.6.1.3, the primary containment isolation valve Specification.	3.6.1.3	3/4.6.M
	3.6.1.4, Drywell Pressure		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.4	3/4.7.G

NRC
Not in DOC A.5

A.2	The requirement in CTS 3.7.G footnote (a), concerning the minimum drywell internal pressure ($\geq$1.0 psig) has been deleted, since the requirement in CTS 3.7.H (ITS 3.6.2.5) to maintain differential pressure between the drywell and the suppression chamber $\geq$1.0 psid is sufficient to minimize the hydrodynamic loads on the torus during the blowdown. Also, CTS 3.7.G Action 1, which provides the actions when the pressure limit required by the footnote isn't met, has been deleted.	N/A	LCO 3.7.G footnote (a), 3.7.G Action 1
3.6.1.5, Drywell Air Temperature			
NONE	NONE	NONE	NONE
3.6.1.6, Low Set Relief Valves			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.6	3/4.6.F
A.2	CTS 3.6.F includes the OPERABILITY requirements for the relief valves, including the low set relief valve group. In ITS LCO 3.6.1.6, only the two low set relief valves are required to be OPERABLE; the relief valves are covered by ITS 3.4.3.	3.6.1.6	3/4.6.F
A.3 Open BSI	Adds two Surveillance Requirements. ITS SR 3.6.1.6.1 ensures the low set relief valves open when manually actuated, which ensures that the valves and solenoids are functioning properly and that no blockage exists in the lines. ITS SR 3.6.1.6.2 ensures that the low set relief valves will actuate automatically on receipt of specific initiation signals by performance of a system functional test. These new Surveillance Requirements are consistent with current testing requirements in CTS 4.5.A.4.a and b (for ADS) except as modified in the DOCs for ITS 3.5.1, "ECCS — Operating."	SR 3.6.1.6.1, SR 3.6.1.6.2	4.5.A.4.a, 4.5.A.4.b
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.7	3/4.7.F
A.2	Not used.	N/A	N/A
A.3	Note 2 to SR 3.6.1.7.1 has been added to clearly state that the vacuum breakers do not have to be closed when they are performing their intended function, which is to open to relieve vacuum.	SR 3.6.1.7.1 Note 2	4.7.F.1

3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.8	3/4.7.E
A.2	Note 2 to SR 3.6.1.8.1 has been added to clearly state that the vacuum breakers do not have to be closed when they are performing their intended function, which is to open to relieve vacuum.	SR 3.6.1.8.1 Note 2	4.7.E.1
3.6.2.1, Suppression Pool Average Temperature			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.1	3/4.7.K
SPACE A.2 these	CTS 3.7.K.2 appears to require the 95°F and 105°F limits to apply at all times in Operational Mode 1 or 2. However, this limit actually only applies when THERMAL POWER is > 1% RTP. 5 This is shown by CTS 3.7.K.2.b, which states that 110°F is the limit when ≤ 1% RTP. Therefore, the ITS LCO for this limit has been clarified to be at > 1% RTP. Once THERMAL POWER is ≤ 1% RTP, the LCO is met if suppression pool temperature is ≤ 110°F, thus, a shutdown to MODE 3 and MODE 4 is not required, as stated in CTS 3.0.B.	LCO 3.6.2.1.a, LCO 3.6.2.1.b	3.7.K.2, 3.7.K.2.b
A.3	Moves the requirements in CTS 3.7.K.3 and 4.7.K.5, relating to the drywell-to-suppression chamber bypass leakage limit, to ITS 3.6.1.1.	3.6.1.1	3.7.K.3, 4.7.K.5
3.6.2.2, Suppression Pool Water Level			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.2	3/4.7.K, 3/4.5.C
A.2	Not used.	N/A	N/A
A.3	Moves the requirements in CTS 3.5.C.2, 3.5.C Action 2, and 4.5.C.2, and footnote (a), relating to the suppression pool level requirements while in MODES 4 and 5, to ITS 3.5.2.	3.5.2 LCO	3.5.C.2, 3.5.C Action 2, 4.5.C.2, and footnote (a)

	3.6.2.3, Suppression Pool Cooling		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.3	3/4.7.M
A.2	The CTS requires verification that each suppression pool cooling valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. The CTS recognizes that the suppression pool cooling function is manually actuated and is interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In the ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. Thus, for suppression pool cooling, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for this systems' valves to be in the non-accident position and still be considered OPERABLE. In addition, since there are no automatic valves for the suppression pool cooling mode, the reference to check automatic valves has been deleted.	SR 3.6.2.3.1	4.7.M.1
	3.6.2.4, Suppression Pool Spray		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.4	3/4.7.L
A.2	The CTS requires verification that each suppression pool spray valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. The CTS recognizes that the suppression pool spray function is manually actuated and is interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In the ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. Thus, for suppression pool spray, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for this systems' valves to be in the non-accident position and still be considered OPERABLE. In addition, since there are no automatic valves for the suppression pool spray mode, the reference to check automatic valves has been deleted.	SR 3.6.2.4.1	4.7.L.1
	3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.5	3/4.7.H

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

A.2	Revises the presentation of the ACTIONS to be consistent with the Applicability. The ITS only requires shutdown to 15% RTP. Below 15% RTP, the Applicability is exited and the ACTIONS are no longer required.	3.6.2.5 ACTION B	3.7.H Action 1
	3.6.3.1, Primary Containment Oxygen Concentration		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.3.1	3/4.7.J
A.2	Revises the presentation of the ACTIONS to be consistent with the Applicability. The ITS only requires shutdown to 15% RTP. Below 15% RTP, the Applicability is exited and the ACTIONS are no longer required.	3.6.3.1 ACTION B	3.7.J Action
A.3	Deletes CTS 4.7.J, which requires oxygen concentration in primary containment to be verified within limit prior to entering the Applicability of CTS 3.7.J (within 24 hours after THERMAL POWER is greater than 15% of RTP). This requirement does not need to be repeated as a separate Surveillance Frequency.	SR 3.0.4	4.0.D 4.7.J
	3.6.4.1, Secondary Containment		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.1	3/4.7.N
A.2	Replaces the definition of SECONDARY CONTAINMENT INTEGRITY and the references to it in CTS 3/4.7.N with the requirement for secondary containment to be OPERABLE, since all the requirements are specifically addressed in the ITS and associated Bases for the Secondary Containment (3.6.4.1), the Secondary Containment Isolation Valves (3.6.4.2), and Standby Gas Treatment System (3.6.4.3).	3.6.4.1, 3.6.4.2, 3.6.4.3	3/4.7.N
A.3	Modifies the requirement to verify that one door in each access is closed to require one door in each access opening to be closed. The Dresden 2 and 3 design includes more than two doors on some of the accesses, and the current Dreden 2 and 3 interpretation of this requirement is that for these accesses, there are multiple access openings, and that each access opening must have at least one door closed.	SR 3.6.4.1.2	4.7.N.2.a
A.4	Moves the requirements in CTS 4.7.N.2.b, relating to the position of secondary containment isolation valves, to ITS 3.6.4.2.	3.6.4.2	4.7.N.2.b

NRC
Not in this Section

NRC
This is more accurate

	3.6.4.2, Secondary Containment Isolation Valves	4.7.N.2.b	
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.2	3/4.7.N 3/4.7.O
A.2	The name and descriptive references to the secondary containment isolation dampers contained in CTS 3.7.O, 4.7.N, and 4.7.O have been generically changed to Secondary Containment Isolation Valves (SCIVs).	3.6.4.2	3/4.7.O, 4.7.N
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path." Additionally, adds ITS ACTIONS Note that facilitates the use and understanding of the intent to consider the affect of inoperable isolation valves on other systems. For a system made inoperable by inoperable SCIVs the applicable ACTIONS for that system also apply. This is consistent with the intent of the CTS.	3.6.4.2 ACTIONS Notes 2 and 3	3.7.O Action
A.4	The CTS 3.7.O Action does not specify penetrations with one or two isolation valves. However, ITS 3.6.4.2 Condition A only applies if one valve in a penetration is inoperable. This inherently ensures maintaining "at least one isolation valve OPERABLE."	3.6.4.2 Condition A	3.7.O Action
A.5	The revised presentation of the CTS 3.7.O Action does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.7.O Action
	3.6.4.3, Standby Gas Treatment System		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.3	3/4.7.P
A.2	Moves the filter testing requirements of CTS 4.7.P.2, 4.7.P.3, 4.7.P.4.a, 4.7.P.4.c, 4.7.P.5 and 4.7.P.6, to ITS 5.5.7. A Surveillance Requirement is added (proposed SR 3.6.4.3.2) to clarify that the tests of the Ventilation Filter Testing Program must also be completed and passed for determining OPERABILITY of the SGT System, which is consistent with the intent of the CTS.	SR 3.6.4.3.2, 5.5.7	4.7.P.2, 4.7.P.3, 4.7.P.4.a, 4.7.P.4.c, 4.7.P.5, 4.7.P.6

A.3	Divides CTS 4.7.P.4.b, which verifies each SGT subsystem starts on the appropriate automatic initiation signals, into two Surveillances. The majority of the instrumentation testing will be performed in SR 3.3.6.2.3, SR 3.3.6.2.4, and SR 3.3.6.2.5, and the actual system functional test portion, which will ensure the SGT System starts on an initiation signal, will be performed as SR 3.6.4.3.3.	SR 3.3.6.2.3, SR 3.3.6.2.4, SR 3.3.6.2.5, SR 3.6.4.3.3	4.7.P.4.b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.7.1, Containment Cooling Service Water System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.1	3/4.8.A
A.2	Adds "or can be aligned to the correct position" in SR 3.7.1.1 to clarify that it is permissible for the CCSW Systems' valves to be in the non-accident position and still be considered OPERABLE.	SR 3.7.1.1	4.8.A
3.7.2, Diesel Generator Cooling Water System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.2	3/4.8.B
A.2	Adds ITS Note, "Separate Condition entry is allowed for each DGCW subsystem," which is consistent with the intent of the CTS.	3.7.2 ACTIONS Note	3.8.B Actions
A.3	Deletes CTS 3.8.B Action statement referencing CTS 3.9.A or 3.9.B, since the statement only serves as a cross reference.	N/A	3.8.B Action
A.4	The CTS requires a verification that each valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. Since all the valves in the flow path are manual valves the word "manual" has been added.	SR 3.7.2.1	4.8.B.1
3.7.3, Ultimate Heat Sink			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.3	3/4.8.C
3.7.4, Control Room Emergency Ventilation System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.4	3/4.8.D

A.2	Moves the filter testing requirements of CTS 4.8.D.3, 4.8.D.4, 4.8.D.5.a, 4.8.D.5.d, 4.8.D.6, and 4.8.D.7, to ITS 5.5.7. Adds a Surveillance Requirement (proposed SR 3.7.4.2) to clarify that the tests of the Ventilation Filter Testing Program must also be completed and passed for determining OPERABILITY of the CREV System, which is consistent with the intent of the CTS.	SR 3.7.4.2, 5.5.7	4.8.D.3, 4.8.D.4, 4.8.D.5.a, 4.8.D.5.d, 4.8.D.6, and 4.8.D.7
3.7.5, Control Room Emergency Ventilation Air Conditioning System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.5	3/4.8.D
A.2	In the ITS, the Control Room Emergency Ventilation and Control Room Emergency Ventilation Air Conditioning Specification has been split into separate Technical Specifications; ITS 3.7.4 for the Control Room Emergency Ventilation (CREV) System and ITS 3.7.5 for the Control Room Emergency Ventilation AC System. Therefore, in ITS 3.7.5, the LCO, Actions, and Surveillance Requirements all refer to the Control Room Emergency Ventilation AC System.	3.7.5	3/4.8.D
3.7.6, Main Condenser Offgas			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.6	3/4.8.I
A.2	Converts the units from μCi/sec/MWt to μCi/sec, by multiplying CTS limit by the Rated Thermal Power licensing basis.	LCO 3.7.6	3.8.I
A.3	Clarifies the Applicability by adding the condition of when any main steam line is not isolated, since a main condenser air ejector cannot be placed in service without main steam pressure (i.e., any main steam line not isolated). The ITS Applicability is also consistent with the CTS 3.8.I Action to be in at least STARTUP with the main steam isolation valves closed. In addition, a Required Action is added that requires the isolation of the air ejector within 12 hours to be consistent with the CTS Applicability.	3.7.6 Applicability, 3.7.6 Required Action B.2	3.8.I Applicability footnote (a)
3.7.7, Main Turbine Bypass System			

NONE	NONE	NONE	NONE
	3.7.8, Spent Fuel Storage Pool Water Level		
A.1	Editorial changes, reformatting, and revised numbering.	3.7.8	3/4.10.H
A.2	Clarifies that the Applicability is limited to circumstances when irradiated fuel assemblies are being moved in the spent fuel storage pool or when new fuel is being moved in the spent fuel storage pool with irradiated fuel assemblies in the spent fuel storage pool. This is acceptable since the purpose of the LCO is to ensure sufficient water is above the irradiated fuel assemblies to meet the assumptions of a fuel handling accident.	LCO 3.7.8	LCO 3.10.H
	Current Specification 3/4.8.E, Flood Protection		
NONE	NONE	NONE	NONE
	Current Specification 3/4.8.F, Snubbers		
NONE	NONE	NONE	NONE
	Current Specification 3/4.8.G, Sealed Source Contamination		
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRIC POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC Sources - Operating		
A.1	Editorial changes, reformatting, and revised numbering. fuel oil	3.8.1	3/4.9.A
A.2	Moves the details in CTS LCO 3.9.A.2.a relating to the required day tank level ~~and in~~ CTS 3.9.A.2.b relating to the bulk fuel storage tank level to ITS SR 3.8.1.4. oil	SR 3.8.1.4	LCO 3.9.A.2.a, LCO 3.9.A.2.b
A.3	Clarifies that a modified DG start involving idling and gradual acceleration to synchronous speed as recommended by the manufacturer may be used, but when modified start procedures are not used, the time, voltage, and frequency tolerance of SR 3.8.1.8 must be met.	SR 3.8.1.2 Note 2	4.9.A.2.c
A.4	CTS 4.9.A.2.c, 4.9.A.2.d, 4.9.A.7, 4.9.A.8.b, 4.9.A.8.c, and 4.9.A.8.h specify requirements for testing of a DG (2/3 diesel generator) that is common to both units. Therefore, a Note is added to the applicable ITS SRs to clearly state the current plant interpretation, i.e., a single test of the common DG at the specified Frequency will satisfy the Surveillance for both units.	SR 3.8.1.2 Note 3, SR 3.8.1.3 Note 5, SR 3.8.1.8 Note 2, SR 3.8.1.10 Note, SR 3.8.1.11 Note 1, SR 3.8.1.15 Note 3, SR 3.8.1.16 Note 3	4.9.A.2.c, 4.9.A.2.d, 4.9.A.7, 4.9.A.8.b, 4.9.A.8.c, 4.9.A.8.h
A.5	Deletes CTS 4.9.A.2.c and 4.9.A.7 footnote (c), which states that CTS 4.9.A.7 (the DG start with a 13 second time requirement) may be substituted for CTS 4.9.A.2.c (the slow start), since it is not necessary.	N/A	4.9.A.2.c and 4.9.A.7 footnote (c)
A.6	Moves the technical content of the fuel oil storage and starting air requirements in CTS 3.9.A Action 7, 4.9.A.2.f, 4.9.A.5, 4.9.A.6, and 4.9.A.10 to ITS 3.8.3.	3.8.3	3.9.A Action 7, 4.9.A.2.f, 4.9.A.5, 4.9.A.6, 4.9.A.10

A.7	In the event AC Sources are inoperable such that a distribution subsystem were inoperable, ITS LCO 3.0.6 would allow taking only the AC Sources ACTIONS; taking exception to complying with the AC Distribution System ACTIONS. Since the AC Sources ACTIONS may not be sufficiently conservative in this event (an entire division may be without power), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a division.	3.8.1 ACTION D Note	3.9.A Actions
A.8	Deletes CTS 3.9.A Actions 3.b and 6.b footnote (e) detail that a successful test of OPERABILITY per CTS 4.9.A.2.c under this ACTION statement satisfies the diesel generator test requirements of ACTION(s) 1 (one offsite circuit inoperable) or 2 (one DG inoperable), since it is unnecessary. In addition, the reference to Action 1 is incorrect since there are no diesel generator testing requirements with an offsite circuit inoperable.	N/A	3.9.A Actions 3.a and 6.b, footnote (e)
A.9	CTS 4.9.A.7 and 4.9.A.9, footnote (a) and CTS 4.9.A.8.c and 4.9.A.8.h, footnote (d), which allow DG engine pre-lubrication when starting diesel generators, references CTS Surveillance Requirements that define requirements for operating DGs. Therefore, the footnotes have been deleted from these Surveillance Requirements.	N/A	4.9.A.7 and 4.9.A.9 footnote (a), 4.9.A.8.c and 4.9.A.8.h footnote (d)
A.10	CTS 4.9.A.8.c footnote (d) allows momentary transients outside of the load range during the full load reject test. This Note is not needed since the requirement specifies a load range which must be rejected and does not specify any explicit transient requirements for load.	N/A	4.9.A.8.c footnote (d)
A.11	The requirement in CTS 4.9.A.8.d.2) to verify the energization of the auto-connected shutdown loads during the loss of offsite power test has been deleted, since the Dresden 2 and 3 design does not include any auto-connected shutdown loads on a loss of offsite power by itself.	N/A	4.9.A.8.d.2)
A.12	With three or more required AC sources inoperable (e.g., two offsite circuits and one DG), ACTIONS would be taken in accordance with ITS 3.8.1, and ITS LCO 3.0.3 entry conditions would not be met. Since CTS 3.9.A does not provide Actions for these conditions, ITS 3.8.1 ACTION G is added to direct entry into ITS LCO 3.0.3, to preserve the existing intent for CTS 3.0.C entry. relays	3.8.1 ACTION G	3.9.A Actions
A.13	The requirement of CTS 4.9.A.8.f.2 ~~that~~ auto-connected loads be energized "through the load sequencer" is changed to "including through time delays, where applicable." The design does not include a "load sequencer" but includes "time delay relays" for some individual components.	SR 3.8.1.19	4.9.A.8.f.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRIC POWER SYSTEMS

	3.8.2, AC Sources - Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.2	3/4.9.B
A.2	Moves the details in CTS LCO 3.9.B.2.a relating to the required day tank level and in CTS 3.9.B.2.b relating to the bulk fuel storage tank level to ITS SR 3.8.2.1.	SR 3.8.2.1	LCO 3.9.B.2.a, LCO 3.9.B.2.b
A.3	In the event AC Sources are inoperable such that a distribution subsystem were inoperable, ITS LCO 3.0.6 would allow taking only the AC Sources ACTIONS; taking exception to complying with the AC Distribution System ACTIONS. Since the AC Sources ACTIONS may not be sufficiently conservative in this event (e.g., SDC could be inoperable), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a required division.	3.8.2 ACTION A Note	3.9.B Actions
A.4	For clarity, adds an exception to CTS 4.9.A.9 (ITS SR 3.8.1.20), which is consistent with the intent of the CTS. This Surveillance is currently not required since it ensures all the DGs are OPERABLE (and no more than one DG is required while in MODES 4 and 5 and handling irradiated fuel assemblies in the secondary containment). In addition, two other exceptions have been included for clarity. CTS 4.9.A.1.b (ITS SR 3.8.1.9) is excluded since only one offsite circuit is required to be OPERABLE. ITS SR 3.8.1.21, the added requirement, for the opposite unit power sources, is excluded because the opposite unit's DG is not required to be OPERABLE by LCO 3.8.2.	SR 3.8.2.1	4.9.B
	3.8.3, Diesel Fuel Oil and Starting Air		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.3	3.9.A Action 7, 4.9.A.2.f, 4.9.A.5, 4.9.A.6, 4.9.A.10, 4.9.B
A.2	The fuel oil and starting air requirements of CTS 3/4.9.A and 3/4.9.B have been moved to a new ITS LCO 3.8.3. An LCO Statement has been provided requiring fuel oil storage and starting air. The Applicability of this new LCO is "when associated DG is required to be OPERABLE." This covers the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements of CTS 3/4.9.A and 3/4.9.B.	3.8.3	3/4.9.A, 3/4.9.B

A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each DG," which is consistent with the intent of the CTS.	3.8.3 ACTIONS Note	3.9.A Actions, 3.9.B Actions
A.4	Moves the technical content of CTS 4.9.A.5 and 4.9.A.6, which provide the DG fuel oil sampling requirements, to ITS 5.5.9. In addition, adds a Surveillance Requirement to clarify that the tests of the Diesel Fuel Oil Testing Program must also be completed and passed for determining Operability of the DGs.	SR 3.8.3.1, 5.5.9	4.9.A.5, 4.9.A.6
	3.8.4, DC Sources - Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.4	3/4.9.C
A.2	Moves the technical content of CTS Table 4.9.C-1 (including CTS 4.9.C.1.a and 4.9.C.2.a) and 3.9.C Actions 4, 5, and 6, the battery cell parameter requirements and CTS 4.9.C.2.c, the average electrolyte temperature requirements to ITS 3.8.6.	3.8.6	3.9.C Actions 4, 5, and 6, 4.9.C.1.a, 4.9.C.2.a, 4.9.C.2.c, Table 4.9.C-1
A.3	Not used.	N/A	N/A
A.4	Deletes the explicit requirement in CTS 4.9.C.1.b to verify correct breaker alignment to each battery charger, since the ITS SR 3.8.4.1 requirement to verify battery terminal voltage, on float charge is adequate.	N/A	4.9.C.1.b
A.5	Added the specific battery charger load values that are equivalent to the manufacturer's ratings.	SR 3.8.4.3, SR 3.8.4.7	4.9.C.3.d
	3.8.5, DC Sources - Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.5	3/4.9.D
A.2	The ITS present the battery hardware components (battery and charger) in the DC Sources LCO (ITS 3.8.5). The battery cell parameters are presented in a separate LCO (ITS 3.8.6).	3.8.5, 3.8.6	3/4.9.D

3.8.6, Battery Cell Parameters			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.6	3.9.C Actions 4, 5, and 6, 4.9.C.1.a, 4.9.C.2.a, 4.9.C.2.c, Table 4.9.C-1, 3/4.9.D
A.2	Presents the 250 and 125 VDC battery cell parameters limits in a separate LCO with appropriate ACTIONS and SRs. In addition, the reference in CTS 3.9.C to Table 4.9.C-1 has been replaced with limits since all battery parameters (i.e., average electrolyte temperature) are not specified in the Table. CTS 4.9.D is being deleted since its provisions only reference requirements in CTS 4.9.C, which are contained in ITS 3.8.6.	3.8.6	3/4.9.C, 3/4.9.D
A.3	Applicability presented as "when associated DC electrical power subsystem is required to be OPERABLE," covering the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements.	3.8.6 Applicability	3.9.C Applicability, 3.9.D Applicability
A.4	Adds ITS ACTIONS Note "Separate condition entry is allowed for each battery," which is consistent with the intent of the CTS.	3.8.6 ACTIONS Note	3.9.C Actions, 3.9.D Actions
A.5	CTS 3.9.C Action 4 allows the Category A parameters(s) to be not within limits and the battery to be considered OPERABLE, provided the associated battery charger is OPERABLE. The specific requirement for the battery charger has been deleted. Whenever any required DC battery charger is inoperable, entry into the associated actions for the DC sources is required (CTS 3.9.C Action 1 and 2 and ITS 3.8.4 ACTIONS). Therefore, the explicit requirement is not necessary in the ITS.	N/A	3.9.C Action 4
A.6	Adds a specific Condition to explicitly require the battery to be declared inoperable when the temperature is not within limit or when Category A or B limits have not been restored within the applicable time, since this is the obvious intent of the CTS.	3.8.6 ACTION B	3.9.C Actions 4, 5, and 6, 3.9.D Actions
3.8.7, Distribution Systems - Operating			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.7	3/4.9.E

A.2	Describes the AC and DC power distribution systems using the designator "Division 1 and Division 2," since these are the actual division designators for the buses listed in CTS LCO 3.9.E (the current detailed listings are relocated to the Bases - see DOC LA.1 for ITS 3.8.7).	LCO 3.8.7	LCO 3.9.E.1, LCO 3.9.E.2
3.8.8, Distribution Systems - Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.8.8	3/4.9.F

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.1, Refueling Equipment Interlocks		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.1	3/4.10.A
A.2	Moves the Refuel Position One-Rod-Out Interlock requirements to ITS 3.9.2.	3.9.2	3/4.10.A
A.3	Since one-rod-out interlock requirements are moved to ITS 3.9.2, restrictions on equipment to be used during CORE ALTERATIONS in ITS 3.9.1 are rewritten, where the Applicability addresses the only CORE ALTERATIONS remaining, i.e., fuel movement.	3.9.1	3.10.A
A.4	Lists each actual refuel platform hoist in the Surveillance Requirement of ITS SR 3.9.1.1, versus the CTS requirement for the refuel platform "hoists" fuel loaded interlocks be Operable.	SR 3.9.1.1	3.10.A.2.c
A.5	Changed the Applicability to specify "during in-vessel fuel movement...", as currently found in CTS 3.10.A.2. (Well as specifying the equipment being used "...with equipment associated with the interlocks...")	3.9.1	3.10.A.2
A.6	Moves to ITS 3.10.1 the allowance in the footnote to place the reactor mode switch in the Run or Startup/Hot Standby to test the reactor mode switch interlock functions. Additionally, moves to ITS 3.10.2 and 3.10.3 the Refuel Position Refueling Equipment Interlock requirements for MODES 3 and 4 (as shown in the Applicability of CTS 3.10.A).	3.10.1, 3.10.2, 3.10.3	3.10.A Applicability, 3.10.A footnote (d)
A.7	Deletes Applicability footnote that provides a cross reference to CTS 3.12.A and 3.12.B, since the format of the ITS does not include providing cross references.	N/A	3.10.A footnote (b)
A.8	Deletes the Applicability footnote that states that the reactor shall be maintained in Operational MODE 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since this equipment is an explicit part of the definition of MODE 5.	N/A	3.10.A footnote (c)
	3.9.2, Refuel Position One-Rod-Out Interlock		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.2	3/4.10.A
A.2	Deletes the requirement that the reactor mode switch shall be in the Shutdown or Refuel position, since it is an explicit part of the definition of MODE 5.	N/A	3.10.A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Moves the Refueling Equipment Interlock requirements to ITS 3.9.1.	3.9.1	3/4.10.A
A.4	The ITS Applicability reflects the current requirements for the one-rod-out interlock to be Operable in MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn.	3.9.2	3.10.A.1
A.5	Moves to ITS 3.10.1 the allowance in the footnote to place the reactor mode switch in the Run or Startup/Hot Standby to test the reactor mode switch interlock functions. Additionally, moves to ITS 3.10.2 and 3.10.3 the Refuel Position One-Rod-Out Interlock requirements for MODES 3 and 4 (as shown in the Applicability of CTS 3.10.A).	3.10.1, 3.10.2, 3.10.3	3.10.A Applicability, 3.10.A footnote (d)
A.6	Deletes Applicability footnote that provides a cross reference to CTS 3.12.A and 3.12.B, since the format of the ITS does not include providing cross references.	N/A	3.10.A footnote (b)
A.7	Deletes the Applicability footnote that states that the reactor shall be maintained in Operational MODE 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since this equipment is an explicit part of the definition of MODE 5.	N/A	3.10.A footnote (c)
3.9.3, Control Rod Position			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.3	3/4.10.C
A.2	Deletes footnotes that provides a cross reference to CTS 3.10.I, 3.10.J and 3.12.B since the format of the ITS does not include providing cross references. In addition, the allowances that fuel can be loaded into the core when a rod is withdrawn under control of the reactor mode switch refuel position one-rod-out interlock has been deleted since the interlock will preclude fuel loading with a rod withdrawn.	N/A	3.10.C footnotes (a) and (b), 3.10.C Action, 4.10.C.1.b
3.9.4, Control Rod Position Indication			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.4	3/4.3.I

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Deletes footnote that provides a cross reference to CTS 3.10.I and 3.10.J, since the format of the ITS does not include providing cross references.	N/A	3.3.I footnote (a)
A.3	Adds ITS Note "Separate Condition entry is allowed for each required channel," which is consistent with the intent of the CTS.	3.9.4 ACTIONS Note	3.3.I Action 3
	3.9.5, Control Rod OPERABILITY - Refueling		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.5	3/4.3.G
A.2	Revises the Operational MODE 5 requirements to say "Each withdrawn control rod shall be OPERABLE," since ITS 3.9.5 includes requirements other than accumulator requirements.	3.9.5	3.3.G
A.3	Deletes footnote that provides a cross reference to CTS 3.10.I and 3.10.J, since the format of the ITS does not include providing cross references.	N/A	3.3.G footnote (a)
A.4	Deletes "unless the control rod is inserted and disarmed or scrammed," since stating the conditions for an exception to performance of the accumulator Surveillance that are equivalent to the Applicability of the LCO is unnecessary.	N/A	4.3.G
A.5	Deletes the action to disarm and the footnote to intermittently rearm the associated directional control valves. During MODE 5 with an accumulator associated with a withdrawn control rod inoperable, the control rod is required to be inserted. Once the control rod is fully inserted, the accumulator is no longer required to be OPERABLE and the entry conditions for the ACTIONS are no longer applicable, thus no additional ACTIONS are required.	N/A	3.3.G Action 2.a and footnote (b)
A.6	Moves, to ITS 3.10.7, the requirements for when more than one control rod is withdrawn with the associated scram accumulators inoperable or no control rod drive pump operating.	3.10.7	3.3.G Action 2.b
	3.9.6, RPV Water Level - Irradiated Fuel		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.6	3/4.10.G
A.2	Moves, to ITS 3.9.7, the requirements for handling new fuel assemblies and control rods.	3.9.7	3/4.10.G

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.3	Deletes "while in OPERATIONAL MODE 5" from the Applicability since the Specification deals only with handling irradiated fuel assemblies, and the only MODE where it is possible to move irradiated fuel assemblies within the reactor pressure vessel is MODE 5.	N/A	3.10.G
	3.9.7, RPV Water Level - New Fuel or Control Rods		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.7	3/4.10.G
A.2	Deletes "while in OPERATIONAL MODE 5" from the Applicability since the Specification deals only with handling new fuel assemblies or control rods, and the only MODE where it is possible to move new fuel assemblies or handle control rods within the reactor pressure vessel is MODE 5.	N/A	3.10.G
	3.9.8, Shutdown Cooling (SDC) - High Water Level		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.8	3/4.10.K
A.2	Requires only that loading of irradiated fuel assemblies into the reactor pressure vessel be suspended versus CTS requirement that all operations involving an increase in the reactor decay heat load be suspended, since this is the only practical method of increasing the reactor decay heat load.	3.9.8 Required Action B.1	3.10.K Action 1
A.3	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 4 hours (initiating the actions as soon as possible).	3.9.8 Required Actions B.2, B.3, and B.4	3.10.K Action 1
A.4	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.9.8 Required Actions B.2, B.3, and B.4	3.10.K Action 1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.9.9, Shutdown Cooling (SDC) - Low Water Level			
A.1	Editorial changes, reformatting, and revised numbering.	3.9.9	3/4.10.L
Current Specification 3/4.10.E, Communications			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.1, Reactor Mode Switch Interlock Testing		
A.1	Editorial changes, reformatting, and revised numbering.	3.10.1	Table 1-2, 3/4.10.A footnote d
	3.10.2, Single Control Rod Withdrawal - Hot Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.10.2	Table 1-2, 3/4.10.A
A.2	Revises CTS 3.10.A Action 2 requiring the reactor mode switch to be locked in the Shutdown position when the one-rod-out interlock is inoperable to only require the mode switch to be placed in Shutdown; locking the mode switch in Shutdown is not required since with the mode switch in Shutdown the LCO is no longer applicable.	N/A	3.10.A Action 2
A.3	Replaces the refuel position one-rod-out interlock Surveillances (CTS 4.10.A.1, 4.10.A.2, and 4.10.A.3) with a generic Surveillance Requirement (proposed SR 3.10.2.1) to perform all required Surveillances in accordance with the applicable SRs; in this case, with the SRs of ITS 3.9.2, Refuel Position One-Rod-Out Interlock.	SR 3.10.2.1	4.10.A.1, 4.10.A.2, 4.10.A.3
	3.10.3, Single Control Rod Withdrawal - Cold Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.10.3	Table 1-2, 3/4.10.A, 3/4.10.I
A.2	Deletes statements that require compliance with the Specification "until a control rod and associated control rod drive mechanism are reinstalled and the control rod is fully inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	3/4.10.I

A.3	Since the MODE 4 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.I.2 and 4.10.I.2 references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	3.10.I.2, 4.10.I.2
A.4	CTS 3.10.I.3.a and CTS 3.10.I.3.b refer to an exception to the current normal SDM requirements, which requires additional margin for immoveable control rods. ITS 3.10.3 does not include the last half of existing 3.a or any of the existing 3.b, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS definition and in the ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn.	3.10.3	3.10.I.3.a, 3.10.I.3.b
A.5	Deletes CTS 3.10.I.4.b and 4.10.I.4.b allowing the four fuel assemblies surrounding the control rod or control rod drive mechanism to be removed from the core and/or reactor vessel to be removed from the core since during MODE 4, the optional requirement of CTS 3.10.I.4.b and 4.10.I.4.b cannot be physically met.	N/A	3.10.I.4.b, 4.10.I.4.b
A.6	Four new Notes have been added for clarity in ITS 3.10.3. The ITS 3.10.3 ACTIONS Note has been added to clarify that the requirement to enter the applicable condition of the affected Specification applies for each of the affected Specifications. ITS 3.10.3 Required Action A.1 Note 1 has been added to clarify that if an affected Specifications ACTIONS state to fully insert all insertable control rods, this includes placing the reactor mode switch in the Shutdown position. ITS 3.10.3 Required Action A.1 Note 2 has been added to clarify that this Required Action is only applicable if the requirement not met is an LCO, since it is written only for an LCO, not a "requirement." ITS SR 3.10.3.2 Note has been added clarifying that if proposed SR 3.10.3.1 is satisfied for ITS 3.10.3.c.1 requirements, then ITS SR 3.10.3.2 is not required to be performed.	3.10.3 ACTIONS Note, 3.10.3 Required Action A.1 Notes 1 and 2, SR 3.10.3.2 Note	N/A
A.7	Separates the CTS 3.10.I ACTION into two ACTIONS, dependent on whether the affected control rod is insertable or not. ITS 3.10.3 ACTIONS are a more detailed presentation of the existing requirement to "initiate action to satisfy the above requirements."	3.10.3	3.10.I ACTION
A.8	Replaces the refuel position one-rod-out interlock Surveillances CTS 4.10.A.1, 4.10.A.2, and 4.10.A.3 with a generic Surveillance Requirement (proposed SR 3.10.3.1) to perform all required Surveillances in accordance with the applicable SRs since ITS 3.10.3 requires the refuel position one-rod-out interlock to be OPERABLE in accordance with ITS 3.9.2.	SR 3.10.3.1	4.10.A.1, 4.10.A.2, 4.10.A.3

A.9	Revises CTS 3.10.A Action 2 requiring the reactor mode switch to be locked in the Shutdown position when the one-rod-out interlock is inoperable to only require the mode switch to be placed in Shutdown; locking the mode switch in Shutdown is not required since with the mode switch in Shutdown the LCO is no longer applicable.	N/A	3.10.A Action 2
	3.10.4, Single Control Rod Drive Removal - Refueling		
A.1	Editorial changes, reformatting, and revised numbering.	3.10.4	3/4.10.I
A.2	Deletes statements that require compliance with the Specification "until a control rod and associated control rod drive mechanism are reinstalled and the control rod is fully inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	3/4.10.I
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.I.2 and 4.10.I.2 references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	3.10.I.2, 4.10.I.2
A.4	CTS 3.10.I.3.a and CTS 3.10.I.3.b refer to an exception to the current normal SDM requirements, which requires additional margin for immoveable control rods. ITS 3.10.4 does not include the last half of existing 3.a or any of the existing 3.b, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS definition and in the ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn.	3.10.4	3.10.I.3.a, 3.10.I.3.b
A.5	Deletes the allowance of CTS 3.10.I.4.b and 4.10.I.4.b, to remove the four fuel assemblies in lieu of inserting and disarming the control rods in a 5 x 5 array since this can be done provided the requirements of ITS 3.10.5 (CTS 3.10.J) are followed.	N/A	3.10.I.4.b, 4.10.I.4.b
A.6	Added a MODE 5 Applicability requirement in ITS 3.10.4 ("with LCO 3.9.5 not met") that is derived from the intent of CTS 3.10.I, which says "the associated control rod drive mechanism may be removed from ... the reactor pressure vessel..." When the control rod drive mechanism is removed, ITS 3.9.5, which requires all withdrawn control rods to be OPERABLE, is not met.	3.10.4 Applicability	N/A

A.7	Adds an alternative Required Action (which results in effectively exiting this Special Operations LCO and restores operation consistent with normal requirements for failure to meet the LCOs which were suspended by the Special Operations LCO) to initiate action to fully insert all control rods immediately, in lieu of meeting the requirements of the LCO.	3.10.4 Required Action A.2.1	N/A
3.10.5, Multiple Control Rod Withdrawal - Refueling			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.5	3/4.10.J
A.2	Deletes statements that require compliance with the Specification "until all control rods and control rod drive mechanisms are reinstalled and all control rods are inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	3.10.J, 4.10.J.1
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.J.2 and 4.10.J.1.b references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	3.10.J.2, 4.10.J.1.b
A.4	Deletes redundant references, since the current MODE 5 requirements for SHUTDOWN MARGIN (SDM) in CTS 3.10.J.3 and Surveillance testing in CTS 4.10.J.1.c are adequate without explicit reference to them.	N/A	3.10.J.3, 4.10.J.1.c
A.5	Adds a MODE 5 Applicability requirement in ITS 3.10.5 ("with LCO 3.9.3, LCO 3.9.4, or LCO 3.9.5 not met") is derived from the intent of CTS 3.10.J, which says "Any number of control rods and/or control rod drive mechanisms may be removed from the core and/or reactor pressure vessel..." During the performance of these activities, ITS 3.9.3 (which requires all control rods to be fully inserted), ITS 3.9.4 (which requires each control rod full-in position indication channel for each control rod to be OPERABLE), and ITS 3.9.5 (which requires all withdrawn control rods to be OPERABLE) are not met.	3.10.5	N/A
A.6	Adds an alternative Required Action (which results in effectively exiting this Special Operations LCO and restores operation consistent with normal requirements for failure to meet the LCOs which were suspended by the Special Operations LCO) to initiate action to fully insert all control rods immediately, in lieu of meeting the requirements of the LCO.	3.10.5 Required Action A.3.1	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

3.10.6, Control Rod Testing - Operating			
NONE	NONE	NONE	NONE
3.10.7, SDM Test - Refueling			
A.1	Editorial changes, reformatting, and revised numbering.	3.10.7	3/4.1.A, Table 3.1.A-1, Table 4.1.A-1, 3.3.G, 3.3.H, 3/4.12.B
A.2	Deletes the exceptions in CTS 3.12.B to CTS 3.10.A (ITS 3.9.1 and ITS 3.9.2) and CTS 3.10.C (ITS 3.9.3) since in the ITS the corresponding Specification no longer requires the reactor mode switch to be locked in Refuel at all times while in MODE 5 and since CTS 3.12.B (ITS 3.10.7) precludes all other CORE ALTERATIONS from taking place.	N/A	3.12.B
A.3	Deletes the current explicit reference to MODE 5 requirements in CTS 3.12.B.1 and 4.12.B.1 for SRM OPERABILITY and Surveillance testing since the reference is redundant to the current and proposed requirements.	N/A	3.12.B.1, 4.12.B.1
A.4	The current requirements for control rod coupling in MODE 5 (CTS 3.3.H) are proposed to be delineated as specific restrictions for SDM in MODE 5 (ITS LCO 3.10.7.c), since they are deleted as normal MODE 5 requirements. This change includes an appropriate ACTION (ITS 3.10.7 ACTION A) and Surveillance (proposed SR 3.10.7.5), consistent with those described in ITS 3.1.3, which governs the MODES 1 and 2 control rod coupling requirements.	LCO 3.10.7.c, 3.10.7 ACTION A, SR 3.10.7.5	3.3.H
A.5	Revises Applicability to clarify actual applicable conditions for the proposed LCO; ITS Applicability now includes ~~"with LCO 3.1.6 not met"~~ since this is the intent of when the LCO is to be used.	3.10.7	3.12.B

"with the reactor mode switch in the Startup/Hot Standby position"

A.6	Adds two new Notes in ITS 3.10.7 for clarity. SR 3.10.7.2 Note has been added to CTS 4.12.B.2 clarifying that if proposed SR 3.10.7.3 is satisfied for ITS LCO 3.10.7.b.1 requirements, then proposed SR 3.10.7.2 is not required to be met and proposed SR 3.10.7.3 Note has been added to CTS 4.12.B.2 clarifying that if proposed SR 3.10.7.2 is satisfied for ITS LCO 3.10.7.b.2 requirements, then SR 3.10.7.3 is not required to be met.	SR 3.10.7.2 Note, SR 3.10.7.3 Note	N/A
A.7	Deletes CTS 3.3.G Action 2.b which provides actions if multiple control rod scram accumulators are inoperable in MODE 5 since the multiple, inoperable withdrawn control rod accumulator requirement is already covered by ITS 3.9.5.	N/A	3.3.G Action 2.b
A.8	Includes APRM requirements of CTS 3/4.1.A in equivalent requirements of ITS 3.10.7.	3.10.7	3/4.1.A
A.9	Modifies the APRM Mode 2 requirements of CTS Tables 3.1.A-1 (including the Actions and Surveillance Requirements) to equivalent MODE 5 requirements in ITS 3.10.7.	3.10.7	3/4.1.A
A.10	Revises CTS 3/4.1.A provided in the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter, dated January 11, 2000.	3.10.7	3/4.1.A
Current Specification 3/4.12.A, Primary Containment Integrity			
NONE	NONE	NONE	NONE
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation			
A.1	Deletes CTS 3/4.12.C from the Dresden 2 and 3 ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter, dated February 23, 2000.	N/A	3/4.12.C

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	4.0	5.0
A.2	Revises the description of the site area boundary.	4.1.1	5.1.A
A.3	Deletes the information that radioactive gaseous effluents and radioactive liquid effluents be located in the OFFSITE DOSE CALCULATION MANUAL.	N/A	5.1.C, 5.1.D

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.1, Responsibility		
A.1	Editorial changes, reformatting, and revised numbering.	5.1	6.1.A, 6.1.B
	5.2, Organization		
A.1	Editorial changes, reformatting, and revised numbering.	5.2	6.2.A, 6.2.B
A.2	Replaces the term "health physics" with the equivalent term "radiation protection" and replaces the title of the individual qualified to implement radiation protection procedures from "Radiation Protection Technician" to the generic function "radiation protection technician."	5.2.1.d, 5.2.2.d	6.2.A.4, 6.2.B.4
	5.3, Unit Staff Qualifications		
A.1	Editorial changes, reformatting, and revised numbering.	5.3	6.3
A.2	Deletes the details for qualification requirements of the Shift Technical Advisor (STA) position since they are addressed in the "Commission Policy Statement on Engineering Expertise on Shift" specified in ITS 5.2.2.f.	5.2.2.f	6.3
	5.4, Procedures		
A.1	Editorial changes, reformatting, and revised numbering.	5.4	6.8.A
A.2	Deletes specific requirements for written procedures to implement the Station Security Plan and the Generating Station Emergency Response Plan since they are also required by 10 CFR 50.54(p) and 10 CFR 50, Appendix E.	N/A	6.8.A.3, 6.8.A.4
A.3	Deletes specific requirement for written procedures for ODCM implementation since it is covered by a more generic item, ITS 5.4.1.d, which requires this activity for all Programs and Manuals.	5.4.1.d	6.8.A.6

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5.5, Programs and Manuals			
A.1	Editorial changes, reformatting, and revised numbering.	5.5	1.0, 4.0.E, 4.7.P, 4.8.D, 3/4.8.H, 3/4.8.J, 4.9.A, 6.8, 6.14
A.2	A statement of applicability of SR 3.0.2 has been added to CTS 6.8.D.1 (ITS 5.5.2), a statement of applicability of SR 3.0.3 has been added to CTS 4.0.E (ITS 5.5.6.c), and a statement of applicability of SR 3.0.2 and SR 3.0.3 has been added to CTS 6.8.D.4 (ITS 5.5.4).	5.5.2, 5.5.6.c, 5.5.4	6.8.D.1, 4.0.E, 6.8.D.4
A.3	Revises wording describing the Radioactive Effluent Controls Program to provide clarity.	5.5.4.d, 5.5.4.f	6.8.D.4.d, 6.8.D.4.f
A.4	Deletes the statement that exempts the requirements of CTS 4.0.B from applying to the frequencies specified in the Primary Containment Leakage Rate Testing Program; the statement is redundant since in the ITS, the ITS Section 3.0 requirements only applies to ITS Sections 3.1 through 3.10.	N/A	6.8.D.5
A.5	Deletes redundant restatement that all applicable requirements must be met.	N/A	4.0.E.4
A.6	Places the filter testing requirements for the Standby Gas Treatment System and the Control Room Emergency Ventilation System in a program, with a general program statement added as ITS 5.5.7. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.7	4.7.P.2, 4.7.P.3, 4.7.P.4, 4.7.P.5, 4.7.P.6, 4.8.D.3, 4.8.D.4, 4.8.D.5, 4.8.D.6, 4.8.D.7
A.7	Revises for clarity the reference to Regulatory Guide 1.52, Revision 2, March 1978 by adding a reference to ANSI/ASME N510-1980 for the in-place charcoal adsorber testing of the Standby Gas Treatment System and Control Room Emergency Ventilation System.	5.5.7	4.7.P.2.a, 4.8.D.3.a

A.8	Places the Offgas Explosive Mixture and Liquid Holdup Tank requirements in a program, with a general program statement added as ITS 5.5.8. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.8	3.8.H, 3.8.J
A.9	Places the diesel fuel oil testing requirements in a program, with a general program statement added as ITS 5.5.9. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.9	4.9.A.5, 4.9.A.6
A.10	Clarifies the Inservice Testing Program requirements by adding a frequency definition of "Every 48 months."	5.5.6	4.0.E
A.11	Added statement that the testing of filter trains following painting, fire, or chemical release is only required if the painting, fire, or chemical release could adversely affect the filter bank or charcoal adsorber capability.	5.5.7	4.7.P.2, 4.8.D.3
5.6, Reporting Requirements			
A.1	Editorial changes, reformatting, and revised numbering.	5.6	Table 3.2.F-1, 6.9
A.2	Requires submittal of reports in accordance with 10 CFR 50.4, versus the CTS requirement that reports be submitted to the Regional Office.	5.6	6.9, 6.9.A.5, 6.9.A.6.c, 6.9.B
A.3	Deletes subtitles of reports since each individual report is named rather than grouped under subtitles.	5.6	6.9
A.4	Allows a single report submittal to satisfy the Occupational Radiation Exposure, Annual Radiological Environmental Operating, and Radioactive Effluent Release reporting requirement for both units.	5.6.1, 5.6.2, 5.6.3	6.9.A.2.a, 6.9.A.3, 6.9.A.4
A.5	Adds another name (electronic dosimeter) for a new type of pocket dosimeter currently in use to estimate the whole body doses required to be reported.	5.6.1	6.9.A.2.a

A.6	Deletes the requirement to report the results of specific activity analysis in which the primary coolant exceeded CTS 3.6.J limits, since it is included in the LER requirements to report fuel cladding failures that exceed expected values or that are caused by unexpected factors, i.e., being seriously degraded.	N/A	6.9.A.2.b
A.7	Requires the Radioactive Effluent Release Report submittal to be "in accordance with 10 CFR 50.36a," in lieu of the current requirement to submit the report "prior to April 1 of each year," since compliance with 10 CFR 50 requirements is required by the Dresden 2 and 3 Operating Licenses.	5.6.3	6.9.A.4
A.8	Deletes duplicate requirement; i.e., the general statement to submit special reports within the time period specified for each report.	N/A	6.9.B .
A.9	Adds a reference to the LHGR limit and the transient linear heat generation rate limit consistent with the limits currently specified in the CORE OPERATING LIMITS REPORT.	5.6.5.a.4	6.9.A.6
A.10	Adds a topical report reference consistent with the Dresden 2 and 3 Technical Specification Change Request submitted to the NRC for approval per ComEd letter JMHLTR #99-0076, dated August 3, 1999.	N/A	6.9.A.6.b
	5.7, High Radiation Area		
A.1	Editorial changes, reformatting, and revised numbering.	5.7	6.12
A.2	Replaces the term "health physics" with the equivalent term "radiation protection" and replaces the title of the individual qualified to implement radiation protection procedures from "Radiation Protection Technician" to the generic function "radiation protection technician."	5.7.1, 5.7.2	6.12.A footnote (a), 6.12.B
	Current Specification 6.4, Training		
NONE	NONE	NONE	NONE
	Current Specification 6.7, Safety Limit Violation		

A.1	Removes the Safety Limit Violation requirements, as they relate to NRC notification and permission to restart the unit, that are contained in and based upon the requirements located in 10 CFR 50.36(c)(1), 10 CFR 50.72, and 10 CFR 50.73.	N/A	6.7
Current Specification 6.11, Radiation Protection Program			
NONE	NONE	NONE	NONE
Current Specification 6.13, Process Control Program			
NONE	NONE	NONE	NONE

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Modifies CTS Table 1.2 by a) the addition of the head closure status (proposed footnote (a)) to MODES 3 and 4, b) the addition of the refuel mode switch position to MODE 2 (including footnote (a)), and c) the deletion of the coolant temperature limit of MODE 5. These changes address plant conditions not previously satisfying a defined MODE, or satisfying more than one MODE.	Table 1.1-1	Table 1.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Extends the APPLICABILITY of each of the Safety Limits to all MODES of operation.	2.1.1.1, 2.1.1.2, 2.1.2, 2.1.1.3	2.1.A, 2.1.B, 2.1.C, 2.1.D

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	The statement, "For Frequencies specified as "once," the above interval extension does not apply," was added to clarify that the 1.25 times the interval specified in the Frequency does not apply to certain Surveillances.	SR 3.0.2	4.0.B

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
NONE	NONE	NONE	NONE
	3.1.2, Reactivity Anomalies		
M.1	The CTS requires the reactivity difference between the actual critical control rod configuration and the predicted critical control rod configuration to be within limits. The CTS Bases clarifies that this verification can be performed by one of two methods: by comparison of the critical rod pattern selected base states to the predicted rod inventory at that state (i.e., rod density comparison) or by comparison of the monitored k_{eff} with the predicted k_{eff} as calculated by an approved 3-D core simulator code. These two methods to meet the CTS were previously approved by the NRC. Since Dresden 2 and 3 predicts the core reactivity using a 3-D simulator code and compares predicted k_{eff} with monitored k_{eff}, the alternate approach (i.e., the control rod density comparison) is not necessary and has been deleted.	N/A	3.3.B
	3.1.3, Control Rod OPERABILITY		
M.1	Adds a Required Action for a stuck control rod. ITS 3.1.3 Required Action A.1 requires the immediate verification that the stuck control rod separation criteria are met.	3.1.3 Required Action A.1	N/A
M.2	Revises the separation criteria for inoperable control rods to ensure the safety analysis assumptions are met. CTS requires the separation criteria to be met only for withdrawn control rods. ITS 3.1.3 Condition D applies to all inoperable control rods (when ≤10% RTP) whether inserted or withdrawn.	3.1.3 Condition D	3.3.C Actions 1.a.1) and 2.a.1)
M.3	If more than one control rod is stuck, the ITS contains an additional requirement to disarm the stuck control rod, providing a necessary level of protection to the control rod drive should a scram signal occur. In addition, the allowance to disarm a stuck control rod electrically is deleted to prevent potential damage if a scram signal occurs.	3.1.3 Required Action A.2	3.3.C Action 1.a.2)a)
M.4	Not Used.	N/A	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.5	Requires control rods to be inserted in lieu of the CTS requirement for "moving," since the purpose of the test is to assure scram insertion capability and restricting the test to only allow control rod insertion provides an increased likelihood of this test detecting a problem that impacts this capability.	SR 3.1.3.2, SR 3.1.3.3	4.3.C.1
M.6	Revises the requirement for non-stuck inoperable control rods, the check of insertion capability is eliminated and is replaced with a requirement to fully insert and disarm all inoperable control rods.	3.1.3 Action ~~D~~ C	3.3.C Action 2.a.2)
3.1.4, Control Rod Scram Times			
M.1	Added a requirement requiring a scram time test, which may be done at any reactor pressure, prior to declaring the control rod operable (and thus, enabling its withdrawal during a startup). In addition, revises the reactor pressure applicability from > 800 psig to ≥ 800 psig for consistency with the new proposed Surveillance.	SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.3, SR 3.1.4.4	4.3.D
M.2	Revises the requirements of the control rod scram time to ensure the negative scram reactivity corresponding to that used in licensing basis calculations is supported by individual control rod drive scram performance distributions allowed by the Technical Specifications. Provides new individual control rod scram time limits, limits the number of slow control rods to 12, ensures no more than 2 slow rods occupy adjacent locations, and ensures that a control rod is not inadvertently considered "slow" when the scram time exceeds 7 seconds.	3.1.4, Table 3.1.4-1	3.3.D, 3.3.E, 3.3.F
3.1.5, Control Rod Scram Accumulators			
M.1	Restricts the current 8 hour allowance to restore an inoperable accumulator to apply only when the reactor pressure is greater than or equal to $\boxed{950}$ psig, since control rods may not insert on a scram signal at reduced reactor pressures with the associated accumulator inoperable. 900	3.1.5 ACTION A	3.3.G Action 1.a

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.6, Rod Pattern Control		
M.1	Adds a new Specification requiring the control rod pattern to be in compliance with the analyzed rod position sequence when THERMAL POWER is ≤ 10% RTP in MODES 1 and 2. This ensures the analysis assumptions relative to the Control Rod Drop Accident are maintained.	3.1.6	N/A
	3.1.7, Standby Liquid Control System		
M.1	Revises the requirement to determine the available concentration of sodium pentaborate in solution anytime water or boron is added to the solution or when the system temperature drops below the limits by including a 24 hour time period to complete the determination. This ensures that any potential change to the boron concentration is quickly evaluated.	SR 3.1.7.5	4.4.A.2.b
M.2	Revises the requirement to demonstrate that the pump suction line from the storage tank is not plugged by adding the requirement to perform this Surveillance once within 24 hours after piping temperature is restored within the limits of ITS Figure 3.1.7-2 (CTS Figure 3.4.A-1).	SR 3.1.7.9	4.4.A.4.c
	3.1.8, SDV Vent and Drain Valves		
NONE	NONE	NONE	NONE
	Current Specification 3/4.3.J, Control Rod Drive Housing Support		
NONE	NONE	NONE	NONE
	Current Specification 3/4.3.N, Economic Generation Control System		
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE
3.2.2, MINIMUM CRITICAL POWER RATIO			
M.1	Adds a new surveillance (ITS SR 3.2.2.2) which specifies that the MCPR limits must be determined within 72 hours after each completion of ITS SR 3.1.4.1, SR 3.1.4.2, and SR 3.1.4.4 (control rod scram testing).	SR 3.2.2.2	N/A
3.2.3, LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE
3.2.4, APRM GAIN AND SETPOINT			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS Instrumentation		
M.1	Adds a 24 month CHANNEL CALIBRATION Surveillance for the Scram Discharge Volume Water Level - High (Thermal Switch and Float Switch) Functional Unit to ensure the associated channels are calibrated properly.	SR 3.3.1.1.17 for Table 3.3.1.1-1 Functions 7.a and 7.b	N/A
M.2	Modifies the Frequency of the CHANNEL CHECK requirement of CTS Table 4.1.A-1 Functional Unit 4, Reactor Vessel Water Level - Low, from 24 hours to 12 hours to ensure this Function is maintained OPERABLE.	SR 3.3.1.1.1 for Table 3.3.1.1-1 Function 4	4.1.A.1 for Table 4.1.A-1 Functional Unit 4
M.3	Adds a Surveillance to verify the automatic enabling of the Turbine Stop Valve—Closure and Turbine Control Valve Fast Closure, Control Oil Pressure—Low Functions at ≥ 45% RTP.	SR 3.3.1.1.14	N/A
~~A.11~~	~~Enhances presentation by requiring actions to be immediately initiated to insert control rods (completing the actions as soon as possible) in lieu of current requirement to insert the control rods in 1 hour (initiating the actions as soon as possible).~~	~~3.3.1.1 Required Action H.1~~	~~Table 3.1.A-1 Actions 13 and 19~~
	3.3.1.2, SRM Instrumentation		
M.1	Places a time limit of 24 hours on how soon prior to the withdrawal of control rods the verification of SRM count rate to be within limits must be performed. In addition, the Surveillance must also be performed once per 24 hours in MODE 2 with IRMs on Range 2 or below and in MODES 3 and 4, regardless of whether or not control rods are withdrawn. Since surveillances must be performed at all times, not just prior to control rod withdrawal, the phrase "before withdrawal of control rods" is not needed and has been deleted.	SR 3.3.1.2.4	4.2.G.1

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M.2	The CTS Applicability does not require SRMs to be OPERABLE when no more than two fuel assemblies are present in each core quadrant with an SRM when those fuel assemblies are positioned adjacent to that quadrant's SRM. The CTS does however, provide specific criteria to be met if movable detectors are being used. The ITS requires at least two SRM channels to be OPERABLE at all times when in MODE 5 (unless performing a spiral offload or reload), but provides specific allowances in the Note to ITS SR 3.3.1.2.4. to verify OPERABILITY for conditions when the removal of fuel assemblies would not maintain the required count rate.	3.3.1.2, SR 3.3.1.2.4 Note	3.10.B Applicability
M.3	CTS 4.9.2.a.3 requires verifying that the detector of an OPERABLE SRM channel is located in the core quadrant where CORE ALTERATIONS are being performed and one is located in the adjacent quadrant. ITS SR 3.3.1.2.2 requires verifying that an OPERABLE SRM detector is located in the fueled region; the core quadrant where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region; and in a core quadrant adjacent to where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region. As a result of providing the additional criteria on where the OPERABLE SRMs must be relocated (one in the fueled region), Note 2 to ITS SR 3.3.1.2.2 is also added to clarify that more than one of the three requirements of ITS SR 3.3.1.2.2 can be satisfied by the same SRM since only two SRMs are required to be OPERABLE.	SR 3.3.1.2.2, including Note 2	4.10.B.1.a
M.4	Adds a Surveillance Requirement requiring the SRMs to be calibrated every 24 months if in MODE 5 to verify the performance of the SRM detectors and associated circuitry.	SR 3.3.1.2.7	N/A
M.5	Adds a restriction to determine signal-to-noise ratio ~~and verify it is greater than or equal to 2:1 or 20:1, depending upon the count rate requirement~~.	SR 3.3.1.2.6, SR 3.3.1.2.5	4.2.G.3, 4.10.B.2
3.3.2.1, Control Rod Block Instrumentation			
M.1	Adds requirements regarding the Reactor Mode Switch—Shutdown Position channels and an associated ACTION and Surveillance Requirement.	Table 3.3.2.1-1 Function 3, 3.3.2.1 ACTION E, SR 3.3.2.1.7	N/A
M.2	Adds an RBM Surveillance to verify the automatic enabling points of the RBM.	SR 3.3.2.1.5	N/A

M.3	The Note to ITS SR 3.3.2.1.2 will require the RWM to be determined Operable (by performing a CHANNEL FUNCTIONAL TEST) within 1 hour after withdrawal of any control rod when RTP is ≤ 10%, not just when the withdrawal is for the purpose of making the reactor critical.	SR 3.3.2.1.2 Note	3.3.L Applicability footnote (a), 4.3.L.2
M.4	With the RWM inoperable, the CTS allows control rod movement to continue provided a second licensed operator or other qualified member of the technical staff verifies control rod movement is in compliance with the prescribed control rod sequence. In the ITS 3.3.2.1, with the RWM inoperable during a reactor startup, continued movement of control rods will only be allowed if ≥ 12 control rods are withdrawn or if a startup with RWM inoperable has not been performed in the last calendar year. 12 months	3.3.2.1 Required Actions C.2.1.1 and C.2.1.2	3.3.L Action
M.5	Adds an RWM Surveillance to verify the automatic enabling point of the RWM.	SR 3.3.2.1.6	N/A
M.6	Adds an RWM Surveillance to verify the bypassing and position of control rods required to be bypassed (taken out of service) in RWM by a second licensed operator or other qualified member of the technical staff.	SR 3.3.2.1.9	N/A
	3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation		
M.1	Adds the requirement that the channels be capable of also tripping the main turbine, in lieu of the CTS requirement that they trip the feedwater system only. The Specification title, LCO and Required Actions have been modified to reflect this change.	3.3.2.2	3/4.2.J
M.2	Adds a requirement to ensure the trip of the feedwater pump breakers and closure of the turbine stop valves, since the LOGIC SYSTEM FUNCTIONAL TEST definition does not require the actuation of the components.	SR 3.3.2.2.5	N/A
M.3	Not used.	N/A	N/A
M.4	Increases the Frequency of the CHANNEL CHECK and CHANNEL FUNCTIONAL TEST requirements for the Reactor Vessel Water Level — High Functional Unit from 24 hours to 12 hours and from 18 months to 92 days, respectively.	SR 3.3.2.2.1, SR 3.3.2.2.2	4.2.J.1 for Table 4.2.J-1 Functional Unit
M.5	Adds a Surveillance to calibrate the trip units of the Reactor Vessel Water Level — High Function every 92 days.	SR 3.3.2.2.3	N/A

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	3.3.3.1, Post Accident Monitoring Instrumentation		
M.1	Adds requirements for the Penetration Flow Path Primary Containment Isolation Valve (PCIV) Position Function, since this Function is a Category 1 instrument for Dresden 2 and 3.	Table 3.3.3.1-1 Function 6, 3.3.3.1 ACTIONS A, B, C, D, and E, SR 3.3.3.1.1, SR 3.3.3.1.5	N/A
A.3	The Reactor Vessel Water Level instrumentation in CTS Table 3.2.F-1 consists of instruments with different ranges to satisfy Regulatory Guide 1.97 requirements. The different ranges are: "medium range" covering approximately 83 inches above the top of active fuel to approximately 203 inches above the top of active fuel; and "fuel zone (wide range)" covering approximately 203 inches above the top of active fuel to approximately 197 inches below the top of active fuel. Currently, CTS Table 3.2.F-1 only specifies requirements for two channels but does not specify the required ranges. Using the ITS format, the instruments required to cover these ranges are delineated in ITS Table 3.3.3.1-1 as separate line items under Function 2, with each channel consisting of only one instrument. Therefore, ITS Table 3.3.3.1-1 Function 2.a (Reactor Vessel Water Level - Fuel Zone (Wide Range)) and Function 2.b (Reactor Vessel Water Level - Medium Range) will each specify requirements for two channels (for a total of 4 channels).	Table 3.3.3.1 Functions 2.a and 2.b	Table 3.2.F-1 Instrumentation 2
	3.3.4.1, ATWS-RPT Instrumentation		

NRC
See Comment 2

M.1	The ATWS-RPT trip logic uses a two-out-of-two logic for each trip Function in both trip systems. The reactor recirculation pumps will trip when one trip system actuates. Therefore, when a channel associated with one Trip Function (e.g., Reactor Water Level - Low Low) is inoperable in both trip systems, the ATWS-RPT trip capability is lost for that Function. Similarly, if channels associated with both Trip Functions are inoperable in both trip systems, the ATWS-RPT trip capability is lost for both ATWS-RPT trip Functions. CTS 3.2.C Actions 2 and 4 address the condition with channels inoperable in both trip systems. Under these conditions the ATWS-RPT trip capability is lost for one and two Trip Functions, respectively. In the ITS, these conditions will require entry into proposed ITS 3.3.4.1 ACTION B and ACTION C, respectively. The ITS Completion Times (72 hours and 1 hour, respectively) are consistent with the current actions for loss of trip function capability in CTS 3.2.C Actions 5 and 6, respectively, but more restrictive than CTS 3.2.C Actions 2 and 4 which give a 14 day repair completion time.	3.3.4.1 ACTIONS B and C	3.2.C Actions 2 and 4
M.2	Adds a Note to ITS 3.3.4.1 Required Action A.2 to prevent this Required Action from being used if the channels are inoperable due to a trip breaker that will not open, because placing the channels in the tripped condition will not accomplish the intended restoration of the functional capability. This new Note will ensure the functional capability of the ATWS-RPT System is restored (by restoring the inoperable channel) within the allowed Completion Time when a trip breaker is inoperable.	3.3.4.1 Required Action A.2 Note	3.2.C Action 2
	3.3.5.1, ECCS Instrumentation		
M.1	Eight additional Functions have been added. The automatic actuation function of the ECCS subsystems ensure the design basis events can be satisfied. These Functions are included in ITS Table 3.3.5.1-1 as follows: 1) Function 1.e, Core Spray Pump Start - Time Delay Relay; 2) Function 2.d, Reactor Steam Dome Pressure - Low (Break Detection); 3) Function 2.e, LPCI Pump Start - Time Delay Relay for Pumps B and D; 4) Function 2.g, Recirculation Pump Differential Pressure-High (Break Detection); 5) Function 2.h, Recirculation Riser Differential Pressure-High (Break Detection); 6) Function 2.i, Recirculation Pump Differential Pressure Time Delay-Relay (Break Detection); 7) Function 2.j, Reactor Steam Dome Pressure Time Delay-Relay (Break Detection); and 8) Function 2.k, Recirculation Riser Differential Pressure Time Delay-Relay (Break Detection). Appropriate ACTIONS and Surveillances have also been added.	Table 3.3.5.1-1 Functions 1.e, 2.d, 2.e, 2.g, 2.h, 2.i, 2.j, and 2.k	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

M.2	Adds a maximum Allowable Value for the CS Pump Discharge Flow—Low (Bypass) Function to ensure the valves will close to provide assumed ECCS flow to the core.	Table 3.3.5.1-1 Function 1.d	Table 3.2.B-1 Functional Unit 1.d
M.3	Adds a CHANNEL CALIBRATION Surveillance for the Suppression Chamber Water Level – High Function to ensure the instrument channels trip at the specified setpoint.	SR 3.3.5.1.~~5~~ 10	N/A
M.4	Not used.	N/A	N/A
M.5	Not used.	N/A	N/A
M.6	Not used.	N/A	N/A
M.7	Not used.	N/A	N/A
M.8	Adds an additional channel for the HPCI Reactor Vessel Water Level - High Function, since the Trip System includes two channels, and both channels must function for the trip system to complete the appropriate logic.	Table 3.3.5.1-1 Function 3.c	Table 3.2.B-1 Functional Unit 3.e
	3.3.5.2, IC System Instrumentation		
M.1	Adds a time delay Allowable value for the Reactor Vessel Pressure—High Function.	SR 3.3.5.2.3	N/A
	3.3.6.1, Primary Containment Isolation Instrumentation		
M.1	An Allowable Value has been added for the Main Steam Line Low Pressure—Timer Function. This Function delays initiation of the Main Steam Line Pressure—Low Function.	Table 3.3.6.1-1 Function 1.c	N/A
M.2	Provides the actual number of channels for the SLCS Initiation Function, in lieu of the CTS "NA."	Table 3.3.6.1-1 Function 5.a	Table 3.2.A-1 Functional Unit 4.a
M.3	Not used.		

M.4	Increases the Surveillance Frequency from 18 months to 92 days for performing the CHANNEL CALIBRATION of the Main Steam Line Flow — High Function.	SR 3.3.6.1.4	4.2.A.1 for Table 4.2.A-1 Functional Unit 3.d
3.3.6.2, Secondary Containment Isolation Instrumentation			
M.1	Revised the Applicability for the Reactor Building Ventilation Exhaust Radiation - High and Refueling Floor Radiation - High Functions to include CORE ALTERATIONS.	Table 3.3.6.2-1 footnote (b)	Tables 3.2.A-1 and 4.2.A-1 Functional Units 2.c and 2.d
M.2	Revised the Applicability for the Reactor Building Ventilation Exhaust Radiation - High and Refueling Floor Radiation - High Functions to include operations with the potential for draining the reactor vessel (OPDRVs).	Table 3.3.6.2-1 footnote (a)	Tables 3:2.A-1 and 4.2.A-1 Functional Units 2.c and 2.d
3.3.6.3, Relief Valve Instrumentation			
M.1	Adds an Allowable Value for the Low Set Relief Valves Reactuation Time Delay Function to ensure the OPERABILITY of the low set relief function.	Table 3.3.6.3-1 Function 1.b	3.6.F, 4.6.F.1
M.2	Increases the Surveillance Frequency from 18 months to 92 days for performing the CHANNEL CALIBRATION of the Low Set Relief Valves Reactor Vessel Pressure Setpoint and Relief Valves Reactor Vessel Pressure Setpoint Functions.	SR 3.3.6.3.1	4.6.F.1.b
3.3.7.1, CREV System Instrumentation			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

M.1	Adds new Specification requiring the Control Room Emergency Ventilation System instrumentation to be OPERABLE to support actions to place the Control Room Emergency Ventilation System in the pressurization mode of operation.	3.3.7.1	N/A
	3.3.8.1, Loss of Power Instrumentation		
M.1	The CTS requires the LOP instruments to be OPERABLE during MODES 4 and 5 only when the associated DG is required to be OPERABLE. In the ITS, the Applicability is being changed to be when the associated DG is required to be OPERABLE by LCO 3.8.2, "AC Sources — Shutdown," which requires the LOP instrumentation to be OPERABLE not only during MODES 4 and 5, but also during movement of irradiated fuel assemblies in the secondary containment.	3.3.8.1 Applicability	Table 3.2.B-1 footnote (e), Table 4.2.B-1 footnote (c)
M.2	Adds a maximum Allowable Value for the Degraded Voltage Function to prevent an inadvertent power supply transfer. for	Table 3.3.8.1-1 Function 2.a	Table 3.2.B-1 Functional Unit 6.b
M.3	CTS allows a loss of Power Instrumentation channel to be inoperable to perform surveillances and not enter the required Actions fro 6 hours provided the Functional Unit maintains actuation capability. ITS will allow only this exception for 2 hours.	3.3.8.1 Surveillance Note 2	3.2.B.1 Note (a)
	3.3.8.2, RPS Electric Power Monitoring		
M.1	Not used.	N/A	N/A
M.2	Adds time delay setting requirements for the overvoltage, undervoltage, and underfrequency protective devices of the RPS logic electric power monitoring assemblies.	SR 3.3.8.2.2	N/A
	Current Specification 3/4.2.H, Explosive Gas Monitoring		
NONE	NONE	NONE	NONE

Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, Recirculation Loops Operating		
M.1	Decreases the total time required to be in MODE 3 from 14 to 12 hours.	3.4.1 Required Action~~s A.1~~ ~~and~~ A.2	3.6.A Action 2
	3.4.2, Jet Pumps		
M.1	Deletes a method of demonstrating jet pump OPERABILITY, the number of acceptable methods for demonstrating OPERABILITY is reduced.	N/A	4.6.B.1.b, 4.6.B.2.b
	3.4.3, Safety and Relief Valves		
M.1	Adds a plant specific requirement that 8 safety valves shall be OPERABLE. Since this change proposes to include a specific number of required safety valves in the ITS, the number of valves will no longer be controlled by ComEd, subject to the provisions of 10 CFR 50.59. Instead, the number of required safety valves will be controlled by the NRC, pursuant to 10 CFR 50.90.	LCO 3.4.3	N/A
	3.4.4, RCS Operational Leakage		
NONE	NONE	NONE	NONE
	3.4.5, RCS Leakage Detection Instrumentation		
M.1	Adds the requirement for a CHANNEL FUNCTIONAL TEST to be performed on the drywell floor drain sump monitoring system on a 31 day frequency to ensure the monitor can perform its function and verifies the relative accuracy of the instrument string.	SR 3.4.5.1	N/A

M.2	Increases the Frequency of the CHANNEL CALIBRATION requirement for CTS 4.6.G.2, Drywell Floor Drain Sump Monitoring System from 18 months to 12 months (proposed ITS SR 3.4.5.2).	SR 3.4.5.2	4.6.G.2
	3.4.6, RCS Specific Activity		
NONE	NONE	NONE	NONE
	3.4.7, Shutdown Cooling System - Hot Shutdown		
NONE	NONE	NONE	NONE
	3.4.8, Shutdown Cooling System - Cold Shutdown		
NONE	NONE	NONE	NONE
	3.4.9, RCS Pressure and Temperature (P/T) Limits		
M.1	Adds specific temperature limits which establish the conditions for startup of an idle recirculation loop. Since this change proposes to include specific limit values in the ITS, the limits will no longer be administratively controlled by ComEd, subject to the provisions of 10 CFR 50.59. Instead, the limits will be controlled by the NRC, pursuant to 10 CFR 50.90.	SR 3.4.9.3, SR 3.4.9.4	N/A
M.2	Deletes the CTS 3.6.D footnote a allowance that the differential temperature between the reactor pressure vessel steam space coolant and the bottom head drain line coolant is not applicable below 25 psig reactor pressure.	N/A	3.6.D footnote a
	3.4.10, Reactor Steam Dome Pressure		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

M.1	Deletes footnote that states that the reactor steam dome pressure limit is not applicable during anticipated transients.	N/A	3.6.L footnote (a)
	Current Specification 3/4.6.N, Structural Integrity		
NONE	NONE	NONE	NONE

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TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS-Operating		
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.1	3/4.5.A
A.2	Deletes footnote (d), which provides a cross reference to CTS 3.9.A, since ITS 3.8.1 Required Action B.2 adequately prescribes the necessary actions when redundant required feature(s) are inoperable.	N/A	3.5.A Actions 2.a and 2.b footnote (d)
A.3	Revises CTS 4.5.A.2.c and 4.5.A.3.b.1) footnote (c) to allow the HPCI flow tests to be performed within 12 hours after adequate reactor steam pressure is available. In addition, CTS 4.5.A.4.b footnote (c) allows the ADS valve actuation test to be deferred until 12 hours after adequate reactor steam pressure is available. Adequate pressure to perform the tests also implies adequate flow must be available to perform the tests.	Note to SR 3.5.1.6, SR 3.5.1.7, and SR 3.5.1.10	4.5.A.2.c, 4.5.A.3.b.1) footnote (c), 4.5.A.4.b footnote (c)
A.4	Deletes the statements in CTS 3.5.A Actions 1, 2, 3 and 4 that require other ECCS equipment to be OPERABLE ("provided that.."). ITS 3.5.1 ACTION J provides direction for various interrelationships between ECCS subsystems and ADS. The ACTION requires entry into LCO 3.0.3 for various combinations of inoperable components, which is consistent with the present Actions for the same combinations.	3.5.1 ACTION J	3.5.A Actions 1, 2, 3 and 4
	3.5.2, ECCS-Shutdown		
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.2	3/4.5.B, 3/4.5.C
A.2	Rewords SRs such that the applicable SRs for low pressure ECCS and for HPCI are presented in the SRs for this Specification, versus referring to the SRs in ITS 3.5.1.	SR 3.5.2.2, SR 3.5.2.3, SR 3.5.2.4	4.5.B
A.3	Not used.	N/A	N/A
A.4	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.5.2 ACTION D	3.5.B Action 2, 3.5.C Action 2

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email errata

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

A.5	Removes statement that the ECCS is not required to be OPERABLE provided "that the reactor vessel head is removed, the cavity is flooded," since the other requirements of the note can only be accomplished if the vessel head is removed and the cavity flooded.	N/A	3.5.B footnote (a), 3.5.C footnote (a)
A.6	Moves CTS 3.5.C.1 and associated Applicability, Action 1, and CTS 4.5.C.1 to ITS 3.6.2.2.	3.6.2.2	3.5.C.1, 3.5.C Action 1, 4.5.C.1
A.7	As an enhanced presentation of current intent, deletes CTS 4.5.C.2.b, which requires periodic verification that the specified conditions of Applicability footnote (a) are met when the suppression pool is inoperable.	N/A	4.5.C.2.b
A.8	Revises the suppression chamber water level of "≥ 8'" specified in CTS 3.5.C.2 and CTS 4.5.C.2.a to "≥ 10 ft 4 inches." This change is provided in the Dresden 2 and 3 ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per a ComEd letter, dated May 20, 1999.	3.5.2.1.a	3.5.C.2, 4.5.C.2.a
	3.5.3, IC System		
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.3	3/4.5.D

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TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS-Operating		
M.1	Revises CTS 3.5.A.2, which requires the low pressure coolant injection (LPCI) subsystem to be OPERABLE and comprised of four OPERABLE LPCI pumps and an OPERABLE flow path capable of taking suction from the suppression chamber and transferring the water to the reactor vessel, to require each ECCS injection subsystem to be OPERABLE. The Bases describes the OPERABILITY requirements for LPCI. There are two LPCI subsystems, each consisting of two motor driven pumps, piping and valves capable of transferring water from the suppression pool to the RPV via the "selected" recirculation loop. Since the CTS only requires that LPCI be able to transfer water to the reactor vessel this change is considered more restrictive on plant operation, however necessary to ensure assumptions of the design basis accidents can be satisfied. In addition, 1) revises the allowance in CTS 3.5.A Action 2.b which allows the entire LPCI System to be inoperable for 7 days to allow only one LPCI subsystem to be inoperable (first part of ITS 3.5.1, Condition B) or one LPCI pump in each LPCI subsystem (~~second part of~~ ITS 3.5.1 Condition C) to be inoperable; and 2) adds a new Action (ITS 3.5.1 Action D) which allows the entire LPCI System to be inoperable (i.e., both LPCI subsystems inoperable), however the Completion Time associated with this ACTION has been reduced to 72 hours.	3.5.1, 3.5.1 Conditions B and C, 3.5.1 Action D	3.5.A.2, 3.5.A Action 2.b Space
M.2	Adds 1) ITS SR 3.5.1.3 requiring the verification of correct breaker alignment to the LPCI swing bus every 31 days; 2) ITS SR 3.5.1.4 requiring the verification that each recirculation pump discharge valve cycles through one complete cycle of full travel or is de-energized in the closed position; 3) ITS SR 3.5.1.11 requiring ~~alternate~~ verification of the automatic transfer capability of the LPCI swing bus power supply from its normal power source to its backup power source.	SR 3.5.1.3, SR 3.5.1.4, SR 3.5.1.11	N/A
M.3	Revises CTS 3.5.A Action 1.b requiring a normal plant shutdown with both CS subsystems inoperable and CTS 3.5.A Action 2.c requiring a normal plant shutdown with the LPCI subsystem and one or both CS subsystems inoperable to requiring entry into LCO 3.0.3.	3.5.1 ACTION J	3.5.A Action 1.b, 3.5.A Action 2.c
M.4	Revises the CTS 4.5.A.3.b.1) requirement for steam supply pressure to be $\leq$ 180 psig consistent with requirements at Quad Cities.	SR 3.5.1.7	4.5.A.3.b.1)
	3.5.2, ECCS-Shutdown		

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TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

M.1	Revises CTS 4.5.B to require explicit values of flow (4500 gpm) and system head corresponding to reactor pressure (20 psig).	SR 3.5.2.4	4.5.B.2
M.2	Deletes the allowance to not require the suppression pool to be OPERABLE during cavity flooding.	N/A	3.5.C.2 footnote (a), 3.5.C Action 2 footnote (a)
~~A.3~~	~~Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible).~~	~~3.5.2 ACTION D~~	~~3.5.B Action 2, 3.5.C Action 2~~
3.5.3, IC System			
M.1	Revises CTS 4.5.D.4 to specify acceptance criteria of removal of the design heat load.	SR 3.5.3.4	4.5.D.4
M.2	Revises CTS 4.5.D.1 to specify the shell side water volume and shell side water temperature acceptance limits.	SR 3.5.3.1	4.5.D.1

NRC See Comment

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, Primary Containment		
NONE	NONE	NONE	NONE
	3.6.1.2, Primary Containment Air Lock		
~~L.2~~	~~In reference to the CTS action to immediately maintain an air lock door closed, changes the word "maintain" to "verify" and 1 hour is allowed to complete the verification in the ITS. The CTS does not specify a time limit to verify closure.~~	~~3.6.1.2 Required Actions A.1 and C.2~~	~~3.7.C Actions 1.a and 3~~
M.1	Adds a Required Action to verify an OPERABLE door is closed in the air lock within 1 hour when the primary containment air lock interlock mechanism is inoperable. The 1 hour is allowed to complete the verification since the level of degradation associated with the CTS Actions is no worse than that allowed for when Primary Containment Integrity (CTS 3.7.A) is not maintained.	3.6.1.2 Required Action B.1	N/A
M.2	CTS 3.7.C Action 2 (for an inoperable primary containment air lock interlock mechanism) does not include a default Action (be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours) consistent with other Actions in CTS 3.7.C. Therefore, for an inoperable primary containment air lock interlock mechanism, CTS LCO 3.0.C must be entered and the plant must be in MODE 3 in 13 hours and MODE 4 in 37 hours. ITS 3.6.1.2 ACTION D is proposed to be added as the default action which will require the plant to be in MODE 3 in 12 hours and MODE 4 in 36 hours. Since this change will require the plant to be in MODE 3 and 4 in less time (i.e., 1 hour), this change is considered more restrictive on plant operation.	3.6.1.2 Action D	3.0.C 3.~~7~~.c Action ~~2~~
	3.6.1.3, Primary Containment Isolation Valves		

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See Comment 3

M.1	Adds a new Applicability of "when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation"," which effectively adds a MODE 4 and 5 requirement to the Shutdown Cooling System isolation valves. Appropriate ACTIONS have been added for when the valves cannot be isolated or restored within the current 4 hour limit.	3.6.1.3 Applicability, 3.6.1.3 ACTION F	N/A
M.2	Adds a new Surveillance Requirement that verifies the 18 inch vent and purge valves, except the torus purge valves, are closed every 31 days except during operations which require them to be open (inerting, de-inerting, pressure control, ALARA or air quality considerations for personnel entry, and Surveillances that require the valves to be open).	SR 3.6.1.3.1	N/A
	3.6.1.4, Drywell Pressure		
NONE	NONE	NONE	NONE
	3.6.1.5, Drywell Air Temperature		
M.1	Adds a new Specification requiring drywell average air temperature to be $\leq$150°F during operations in MODES 1, 2, and 3, since the accident analyses of UFSAR, Section 6.2 assumes this temperature as an initial condition in the containment analysis. Appropriate ACTIONS and a Surveillance Requirement are also added.	3.6.1.5, 3.6.1.5 ACTIONS A and B, SR 3.6.1.5.1	N/A
	3.6.1.6, Low Set Relief Valves		
NONE	NONE	NONE	NONE
	3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers		
M.1	Reduces the time to verify that at least one vacuum breaker in the line is closed if it is determined that one vacuum breaker is not closed (otherwise inoperable) from 2 hours to 1 hour, consistent with the Primary Containment Specification, ITS 3.6.1.1.	3.6.1.7 ACTION B	3.7.F Action 2

	3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers		
M.1	CTS 3.7.E Action 1 allows "one or more" of the required suppression chamber-to-drywell vacuum breakers to be inoperable for opening. However, the current accident analysis does not allow two or more vacuum breakers to be inoperable. When more than one vacuum breaker is inoperable, CTS LCO 3.0.C must be entered. Therefore, ITS 3.6.1.8 ACTION A ensures that only one vacuum breaker can be inoperable for opening, and if more than one is inoperable for opening, ITS LCO 3.0.3 will continue to be entered.	3.6.1.8 ACTION A	3.7.E Action 1
	3.6.2.1, Suppression Pool Average Temperature		
M.1 150	CTS allows the suppression pool temperature to be increased to 120°F with the main steam isolation valves (MSIVs) closed following a scram. The ITS, which requires reactor vessel depressurization to < $\boxed{200}$ psig when pool temperature exceeds 120°F, does not depend upon if the MSIVs are open or closed. In addition, the CTS 4.7.K.2.c requirement that the 30 minute temperature verification after a scram is required only with the main steam line isolation valves closed has been deleted, since the temperature verification, (as modified by DOC L.2 of ITS 3.6.2.1) is now required at all times following a scram.	3.6.2.1 ACTION E	3.7.K.2.c, 4.7.K.2.c
M.2	The CTS Applicability for the 110°F limit is MODES 1, 2, and 3 with THERMAL POWER ≤ 1% RTP. The CTS Applicability for the 120°F limit is MODES 1, 2, and 3. However, the current Actions for when temperature exceeds 110°F require scramming the reactor, and for when temperature exceeds 120°F only requires a depressurization to < 150 psig, both of which are still MODE 3. In the ITS, when temperature exceeds 110°F or 120°F, the unit must also be placed in MODE 4 within 36 hours.	3.6.2.1 ACTIONS D and E	3.7.K.2.b, 3.7.K.2.c, 3.7.K Actions 4 and 5
	3.6.2.2, Suppression Pool Water Level		
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

	3.6.2.3, Suppression Pool Cooling		
M.1	Adds a specific value for verification of the required LPCI pump flow when in the suppression pool cooling mode, which ensures primary containment peak pressure and temperature can be maintained below the design limits during a DBA.	SR 3.6.2.3.2	4.7.M.2
	3.6.2.4, Suppression Pool Spray		
M.1 10	Adds a Surveillance Requirement that verifies each suppression pool spray nozzle is unobstructed every 5 years, which ensures that when a suppression pool spray subsystem is required per its design function that it will perform as designed.	SR 3.6.2.4.2	N/A
	3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure		
M.1	The Applicability for CTS 3.7.H ends 24 hours prior to reducing THERMAL POWER to ≤ 15% RTP preliminary to a scheduled reactor shutdown. The Applicability for ITS 3.6.2.5 will end 24 hours prior to reducing THERMAL POWER to < 15% RTP prior to the next scheduled reactor shutdown. Thus, the Applicability for ITS 3.6.2.5 lasts slightly longer than the current Applicability (since < 15% RTP is reached slightly after ≤ 15% RTP is reached).	3.6.2.5 Applicability	3.7.H Applicability
	3.6.3.1, Primary Containment Oxygen Concentration		
NONE	NONE	NONE	NONE
	3.6.4.1, Secondary Containment		
M.1	Requires both subsystems be tested in the course of 48 months, as represented by the Staggered Test Basis requirement of the 24 month Frequency. CTS requires that one subsystem be tested every 18 months; however, the same SGT subsystem could be tested at each testing occurrence.	SR 3.6.4.1.3	4.7.N.3

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TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

M.~~8~~ 2	Adds a Surveillance that requires verifying secondary containment equipment ~~and blowout~~ hatches are closed and sealed every 24 months.	SR 3.6.4.1.~~3~~ 4	~~4.7.N.2.b~~ N/A
3.6.4.2, Secondary Containment Isolation Valves			
M.1	Adds a Surveillance that requires the isolation time of each power operated, automatic SCIV to be verified within limits, which provides assurance that the secondary containment isolation valves will function and the secondary containment will perform as assumed in the safety analyses.	SR 3.6.4.2.2	N/A
M.2	CTS 4.7.N.2.b requires all secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers and required to be closed during accident conditions to be closed. This can be met by a single manual valve being closed. CTS 3.7.O requires each secondary containment ventilation system automatic isolation damper to be OPERABLE. CTS 3/4.7.O does not prescribe limitations on manual valves. ITS LCO 3.6.4.2 requires each SCIV to be OPERABLE and proposed SR 3.6.4.2.1 requires the verification that each secondary containment isolation manual valve and blind flange that is not locked sealed or otherwise secured and is required to be closed during an accident is closed. This provides assurance that the position of all secondary containment isolation valves and blind flanges are properly controlled to ensure design basis assumptions are met.	LCO 3.6.4.2 SR 3.6.4.2.1	4.7.N.2.b
3.6.4.3, Standby Gas Treatment System			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.7.1, Containment Cooling Service Water System			
NONE	NONE	NONE	NONE
3.7.2, Diesel Generator Cooling Water System			
M.1	Since an opposite unit DG is required by ITS 3.8.1, the LCO statement has been modified to clearly require the opposite unit DGCW subsystem that provides cooling to the opposite unit DG.	3.7.2	3.8.B
3.7.3, Ultimate Heat Sink			
NONE	NONE	NONE	NONE
3.7.4, Control Room Emergency Ventilation System			
NONE	NONE	NONE	NONE
3.7.5, Control Room Emergency Ventilation Air Conditioning System			
NONE	NONE	NONE	NONE
3.7.6, Main Condenser Offgas			
M.1	Changes the amount of increase requiring verification that the release rate of the sum of noble gases measured prior to the holdup line is within limits following an increase from > 50% to include an increase equivalent to 50%.	SR 3.7.6.1	4.8.I.2.b

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

	3.7.7, Main Turbine Bypass System		
M.1	Adds ITS 3.7.7, "Main Turbine Bypass System," which will require the Main Turbine Bypass System to be OPERABLE or an MCPR penalty to be applied, to help ensure the safety analyses assumptions of certain events are maintained by limiting the resulting MCPR if the event were to occur.	3.7.7	N/A
	3.7.8, Spent Fuel Storage Pool Water Level		
M.1	The CTS requires the spent fuel water level to be maintained at a level of ≥ 33 ft. The ITS requires the spent fuel storage pool water level to be ≥ 19 ft over the top of irradiated fuel assemblies seated in the spent fuel storage pool racks, which is approximately a 9 inch increase in the water level requirement.	3.7.8	3.10.H
	Current Specification 3/4.8.E, Flood Protection		
NONE	NONE	NONE	NONE
	Current Specification 3/4.8.F, Snubbers		
NONE	NONE	NONE	NONE
	Current Specification 3/4.8.G, Sealed Source Contamination		
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC Sources - Operating		
M.1	Adds two additional AC sources to the minimum requirements in CTS 3.9.A for AC Sources - Operating. The requirements were added to ensure the appropriate AC sources are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirements were added as LCO 3.8.1.c and LCO 3.8.1.d. LCO 3.8.1.c will require one qualified circuit between the offsite transmission network and the opposite unit's Division 2 onsite Class 1E AC electrical power distribution subsystem(s) and LCO 3.8.1.d will require the opposite unit's DG, each capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), and LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only). These added requirements are necessary since safety related equipment is shared between both units. Due to these additions, two notes have been added. The first Note has been added to the Applicability and allows the opposite unit's AC electrical power sources in LCO 3.8.1.c and d to not be required when the associated equipment is inoperable. The second Note has been added to the ACTIONS and excludes the applicability of LCO 3.0.4 for inoperable opposite unit AC electrical power sources. In addition, since the Specification has been prepared for both units consistent with CTS, two Notes have been added to the Surveillance Requirements (ITS Surveillance Requirements Notes 1 and 2) to clearly define the applicability of the Surveillances to both units. An additional Surveillance (SR 3.8.1.21) has also been added to ensure the opposite unit's power sources are properly tested.	LCO 3.8.1.c, LCO 3.8.1.d, 3.8.1 Applicability Note, 3.8.1 ACTIONS Note, Surveillance Requirements Notes 1 and 2, SR 3.8.1.21	N/A
M.2	Adds two Required Actions to cover the situation when an offsite circuit is inoperable concurrent with a "redundant required feature." These Required Actions are similar to those required when a DG and a system, subsystem, train, component, or device are concurrently inoperable (CTS 3.9.A Action 4). Limiting these situations to 24 hours when one offsite circuit is inoperable (ITS 3.8.1 Required Action A.2) and 12 hours when both offsite circuits are inoperable (ITS 3.8.1 Required Action C.1) will ensure that the necessary equipment remains powered to meet the UFSAR.	3.8.1 Required Actions A.2 and C.1	N/A
M.3	Adds a Note that requires SR 3.8.1.3 (the DG load Surveillance) to be immediately preceded by a successful performance of SR 3.8.1.2 (the DG start Surveillance), ensuring the DG load carrying capability is tested subsequent to a successful DG start test.	SR 3.8.1.3 Note 4	N/A

M.4	Adds limitations on the operating power factor for the 24-hour run. The actual power factor values have been added to the Bases. A Note has been also added to ensure a momentary transient that results in the power factor not being met does not invalidate the 24 hour run.	SR 3.8.1.15, including Notes 1 and 2	4.9.A.8.h
M.5	Provides an upper steady state voltage limit of 4368V and a lower voltage limit (both steady state and initial startup) of 3952V. The proposed change conservatively reduces the DG allowable voltage limits from +/- 10% to +/- 5%.	SR 3.8.1.2, SR3.8.1.8, SR 3.8.1.10, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19	4.9.A.2.c, 4.9.A.7, 4.9.A.8.b, .2) 4.9.A.8.d.2), 4.9.A.8.e, 4.9.A.8.f.2)
M.6	Not used.	N/A	N/A
M.7	Not used.	N/A	N/A
M.8	Changes the CTS 4.9.A.8.h requirement for a slow restart of each DG after the diesel has been loaded for a period of time to a fast restart. The changed requirement will require the verification that each DG starts and achieves in ≤ 13 seconds, voltage ≥ 3952 and frequency ≥ 58.8 Hz; and steady state voltage of ≥ 3952 V and ≤ 4368 V and frequency ≥ 58.8Hz and ≤ 61.2 Hz.	SR 3.8.1.16	4.9.A.8.h
M.9	If CTS 4.9.A.8.h (the DG restart test portion) fails after the performance of the 24 hour DG load test, CTS 4.9.A.8.h footnote (f) allows the DG to be operated at "approximately" full load for 2 hours or until the operating temperature has stabilized. The ITS provides an explicit load limit of ≥ 2340 kW and specifies that the DG operate for ≥ 2 hours at this load. The load limit is 90% of the continuous rating of the DG, consistent with the minimum load proposed for the monthly DG test, and the 2 hour time limit at this load ensures operating temperatures are stabilized. In addition, due to the addition of an explicit load limit, an allowance has been provided to allow momentary transients below the 2340 kW load limit to not invalidate the 2 hour run requirement.	SR 3.8.1.16, including Note 1	4.9.A.8.h, including footnote (f)
M.10	Requires the minimum voltage for the 10 year DG simultaneous start test to be 3952 V within 13 seconds; whereas the CTS does not provide a minimum voltage the DGs must attain within the 13 second DG start time assumed in the accident analysis.	SR 3.8.1.20	4.9.A.9
3.8.2, AC Sources - Shutdown			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

M.1	Specifies that the offsite circuit required to be OPERABLE during shutdown conditions must be available to supply power to all equipment required to be OPERABLE in the current plant condition. Since the ITS 3.8.2 circuit OPERABILITY requirements are proposed to require them capable of supplying power to necessary electrical power distribution subsystems, if one or more subsystems are not capable of being powered via an offsite circuit, that circuit is inoperable. The CTS is not specific as to what the required circuit must be powering. To ensure conservative actions, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is also added.	LCO 3.8.2.a, 3.8.2 Required Action A.1	3.9.B.1
M.2	Requires the single unit DG required OPERABLE during shutdown conditions to be associated with one or more systems, subsystems, or components required to be OPERABLE. The CTS is not specific as to what Division that DG must be associated with.	LCO 3.8.2.b	3.9.B.2
M.3	When a required offsite circuit or a unit DG is inoperable, the actions imposed by CTS 3.9.B Action 2 do not necessarily place the unit in a MODE or other specified condition in which CTS LCO 3.9.B is not applicable. Therefore, ITS 3.8.2 Required Actions A.2.4 and B.4 are being added, which implement a requirement to immediately initiate action to restore the required power sources to OPERABLE status.	3.8.2 Required Actions A.2.4 and B.4	N/A
	3.8.3, Diesel Fuel Oil and Starting Air		
NONE	NONE	NONE	NONE
	3.8.4, DC Sources - Operating		
M.1	Deletes the CTS 4.9.C.6 allowance to replace or restore the battery to 100% or greater of manufacturer's rated capacity during the next refuel outage, for a battery that has shown signs of degradation or reached 85% service life and delivers a capacity of less than 100% of manufacturer's rated, in lieu of performing either a performance discharge test or a modified performance test to verify battery capacity every 12 months.	N/A	4.9.C.6

M.2	Adds an additional DC source to the minimum requirements in CTS 3.9.C for DC Sources - Operating. The requirement was added to ensure the appropriate DC sources are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirement was added as LCO 3.8.4.c. LCO 3.8.4.c will require the opposite unit's 125 VDC electrical power subsystem capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only), and LCO 3.8.1, "AC Sources - Operating." This added requirement is necessary since safety related equipment is shared between both units. An Action (ITS 3.8.4 ACTION G) has been added, which requires the restoration of the opposite unit's electrical power subsystems to OPERABLE status within 7 days.	LCO 3.8.4.c, 3.8.4 ACTION G	N/A
M.3	Deletes the CTS 4.9.C.2.b and 4.9.C.3.c provisions which allow the battery terminal and connector resistance to be ≤ 20% above the baseline connection resistance, in lieu of demonstrating that the measured battery terminal and connector resistance is ≤ 150 X 10^{-6} ohms.	N/A	4.9.C.2.b, 4.9.C.3.c
	3.8.5, DC Sources - Shutdown	LCO 3.8.5	LCO 3.9.D
M.1	~~Not used.~~ INSERT M.1	~~N/A~~	~~N/A~~
M.2	The CTS 3.9.D, "DC Sources — Shutdown" Action has been modified by a Note stating that LCO 3.0.3 is not applicable (ITS 3.8.5 ACTIONS Note). If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. This clarification is necessary because defaulting to LCO 3.0.3 during irradiated fuel assembly movement in MODE 1, 2, or 3 would require the reactor to be shutdown, but would not require suspension of movement of irradiated fuel assemblies.	3.8.5 ACTIONS Note	N/A
M.3	In the event the necessary DC sources are not OPERABLE, ITS 3.8.5 Required Action A.2.4 is added to commence and continue attempts to restore the necessary DC sources, resulting in an action that does not allow continued operation in the existing plant conditions. This has the effect of not allowing MODE changes per ITS LCO 3.0.4 .	3.8.5 Required Action A.2.4	N/A

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INSERT M.1 (LCO 3.8.5 Dresden/Quad)

The existing requirement of CTS 3.9.D for one 250 VDC and one 125 VDC electrical power sources to be OPERABLE during shutdown conditions is not specific as to what the sources must be powering. The requirement in ITS LCO 3.8.5 specifies that the sources must support an associated division of the onsite Class 1E DC Electrical Power Distribution System required by LCO 3.8.8, "Distribution Systems - Shutdown." This added restriction conservatively assures that at least the 250 VDC and one 125 VDC electrical power distribution subsystems have an OPERABLE DC source (battery and associated charger) supplying it with power, when required.

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

	3.8.6, Battery Cell Parameters		
M.1	Adds a new requirement for when a Category A or B limit is not met requiring a check within 1 hour that the pilot cell electrolyte level and float voltage are within the Category C limits.	3.8.6 Required Action A.1	3.9.C Actions 4 and 5
M.2	Deletes allowance to correct the Category B float voltage limit for average electrolyte temperature based on IEEE-450, 1987 recommendations.	N/A	Table 4.9.C-1 footnote (c)
M.3	Imposes limitations that restrict the use of replacing specific gravity checks with charging current checks to 7 days when the battery is on float change following a battery charge only. ITS also requires an actual specific gravity measurement at the end of the 7 day allowance.	Table 3.8.6-1 footnote (c)	Table 4.9.C-1 footnote (b)
M.4	Changes the Float Voltage Allowable Value (Category C) from ≥ 2.07 volts for each connected cell to > 2.07 volts for each connected cell, consistent with the recommendation identified in IEEE-450-1995, Annex C, C.1 Note.	Table 3.8.6-1 Category C	Table 4.9.C-1 Category B Allowable Value
	3.8.7, Distribution Systems - Operating		
M.1	Establishes a maximum time allowed for any combination of distribution subsystems listed in ITS LCO 3.8.7.a to be inoperable during any single contiguous occurrence of failing to meet the LCO; i.e., "16 hours from discovery of failure to meet LCO 3.8.7.a." CTS does not provide this restriction.	3.8.7 ACTIONS A and B	N/A
M.2	Adds an action that requires entry into ITS 3.0.3 if the loss of two or more electrical power distribution, in combination, subsystems results in a loss of safety function. CTS does not provide this restriction when the loss of safety function is the result of a combination of inoperable AC and DC subsystems.	3.8.7 ACTION E	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

M.3	Adds additional AC and DC distribution subsystems have been added to the minimum requirements in CTS 3.9.E for Distribution - Operating. The requirement was added to ensure the appropriate AC and DC distribution subsystems are OPERABLE during unit operation in MODES 1, 2, and 3 to satisfy the requirements of the UFSAR. The new requirements were added as LCO 3.8.7.b. LCO 3.8.7.b will require the opposite unit's AC and DC electrical power distribution subsystems capable of supporting the equipment required to be OPERABLE by LCO 3.6.4.3, "Standby Gas Treatment (SGT) System," LCO 3.7.4, "Control Room Emergency Ventilation (CREV) System" (Unit 3 only), LCO 3.7.5, "Control Room Emergency Ventilation Air Conditioning (AC) System" (Unit 3 only), and LCO 3.8.1, "AC Sources - Operating." These added requirements are necessary since safety related equipment is shared between both units. An Action (ITS 3.8.7 ACTION C) has been added, which requires the restoration of the opposite unit's required electrical power distribution subsystems to OPERABLE status within 7 days. In addition, ITS 3.8.7 ACTION C includes a Note to enter applicable Conditions and Required Actions of LCO 3.8.1 when Condition C results in the inoperability of a required offsite circuit.	LCO 3.8.7.~~c~~ b, ACTION C	N/A
	3.8.8, Distribution Systems - Shutdown		
M.1 Open	Adopting TSTF-204 may result in changes to this M-DOC. ITS 3.8.8 specifies that the distribution systems necessary to supply AC and DC power to all equipment required to be OPERABLE in the current plant condition must be OPERABLE. This added restriction conservatively assures the needed sources of power are OPERABLE; even if this results in both the Division 1 and Division 2 distribution subsystems being required. The CTS 3.9.F Action has been modified to be "one or more required" instead of the current "less than," to account for this potential addition. In addition, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is added to ensure the appropriate actions are taken based on the equipment made inoperable by the loss of the distribution subsystem.	LCO 3.8.8, 3.8.8 Required Action A.1	LCO 3.9.F, 3.9.F Action

M.2	The CTS 3.9.F, "Distribution — Shutdown" Action has been modified by a Note stating that LCO 3.0.3 is not applicable (ITS 3.8.8 ACTIONS Note). If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. This clarification is necessary because defaulting to LCO 3.0.3 during irradiated fuel assembly movement in MODE 1, 2, or 3 would require the reactor to be shutdown, but would not require suspension of movement of irradiated fuel assemblies.	3.8.8 ACTIONS Note	N/A
M.3	In the event the necessary Division 1, 2, or 3 electrical power distribution subsystems are not Operable, ITS 3.8.8 Required Action A.2.4 is added to commence and continue attempts to restore the necessary electrical power distribution subsystems, resulting in an action which does not allow continued operation in the existing plant condition. This has the effect of not allowing MODE changes per LCO 3.0.4. ITS 3.8.8 Required Action A.2.5 is also added for the Division 1 and 2 actions which assures the appropriate consideration is applied for shutdown cooling systems that are without required power, since additional actions not provided in the ITS 3.8.8 ACTIONS are required when shutdown cooling is inoperable.	3.8.8 Required Actions A.2.4 and A.2.5	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.1, Refueling Equipment Interlocks		
M.1	Adds the service platform hoist fuel loaded interlock to the list of refueling interlocks since the service platform hoist can be operated over the reactor core during refueling and the design includes a hoist loaded interlock that assures no control rod is withdrawn when fuel is being loaded into the reactor.	SR 3.9.1.1	3.10.A.2
	3.9.2, Refuel Position One-Rod-Out Interlock		
NONE	NONE	NONE	NONE
	3.9.3, Control Rod Position		
NONE	NONE	NONE	NONE
	3.9.4, Control Rod Position Indication		
M.1	Changes the Applicability to MODE 5, regardless of whether or not a control rod is withdrawn. CTS 3.3.I Action 3 for inoperable control rod position indication in MODE 5 only requires movement of the control rod to a position where it has an OPERABLE position indicator or to insert the control rod. The ITS ACTIONS require that fuel movement and control rod withdrawal be suspended and all insertable control rods in core cells containing fuel assemblies be fully inserted, or alternatively, that the control rod be fully inserted and disarmed. Also, a Completion Time has been added to specify that the Required Action be completed "immediately."	3.9.4, 3.9.4 ACTION A	3.3.I, 3.3.I Action 3

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.5, Control Rod OPERABILITY - Refueling		
M.1	Adds a new requirement and associated ACTION and Surveillance Requirement for control rod OPERABILITY during refueling, i.e., each withdrawn control rod must be capable of insertion (by scram).	3.9.5, 3.9.5 ACTION A, SR 3.9.5.1	N/A
	3.9.6, RPV Water Level - Irradiated Fuel		
NONE	NONE	NONE	NONE
	3.9.7, RPV Water Level - New Fuel or Control Rods		
NONE	NONE	NONE	NONE
	3.9.8, Shutdown Cooling (SDC) - High Water Level		
NONE	NONE	NONE	NONE
	3.9.9, Shutdown Cooling (SDC) - Low Water Level		
M.1	Requires the following actions to be immediately initiated if an alternate method of decay heat removal is not verified: 1) restore secondary containment to OPERABLE status ; 2) restore one SGT subsystem to OPERABLE status; and 3) restore isolation capability in each required secondary containment penetration flowpath not isolated. These requirements will ensure the secondary containment boundary is intact to filter any release in the unlikely case the loss of shutdown cooling results in a release of fission products.	3.9.9 ACTION B	N/A
	Current Specification 3/4.10.E, Communications		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.1, Reactor Mode Switch Interlock Testing		
M.1	Adds an appropriate ACTION to identify the Required Actions and Completion Times for noncompliance with Special Operations ITS 3.10.1. Also, Surveillance Requirements are added to provide increased assurance of continued compliance with Special Operations ITS 3.10.1.	3.10.1 ACTION A, SR 3.10.1.1, SR 3.10.1.2	N/A
	3.10.2, Single Control Rod Withdrawal - Hot Shutdown		
M.1	Adds additional restrictions to ensure 1) an OPERABLE RPS SDV trip and an OPERABLE control rod, or to appropriately preclude the possibility of a local reactivity excursion; 2) the IRM, Reactor Mode Switch Shutdown Position, and Manual Scram RPS Functions of ITS 3.3.1.1; 3) the control rod position indication must be OPERABLE to support the one-rod-out interlock; and 4) all other control rods must be fully inserted. Furthermore, an ACTION and Surveillance Requirements are also provided in the proposed presentation for these allowances.	LCO 3.10.2 Item b, LCO 3.10.2 Item c, LCO 3.10.2 Item d.1, LCO 3.10.2 Item d.2,	N/A
	3.10.3, Single Control Rod Withdrawal - Cold Shutdown		
M.1	If CTS 3.10.I is not met and the withdrawn control rod is insertable, two additional Required Actions are provided in ITS 3.10.3 ACTION A. ITS 3.10.3 Required Action A.2.1 requires action to be initiated immediately to fully insert all insertable control rods. ITS 3.10.3 Required Action A.2.2 requires the placing of the reactor mode switch to the Shutdown position, which will preclude withdrawal of any control rod. If CTS 3.10.I is not met and the withdrawn control rod is not insertable, an additional Required Action, ITS 3.10.3 Required Action B.2.1, will require action to be initiated immediately to fully insert all control rods.	3.10.3 Required Actions A.2.1, A.2.2, and B.2.1	3.10.I
M.2	CTS provides an allowance to withdraw a single control rod while in MODE 4 provided the one-rod-out interlock is OPERABLE; however, the ITS applies an additional restriction to ensure the control rod position indication is OPERABLE (required to support the one-rod-out interlock).	LCO 3.10.3.b.1	N/A

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.4, Single Control Rod Drive Removal - Refueling		
M.1	Inputs to the one-rod-out interlock (rod position on the rod to be removed) must be overridden to remove the rod; thus, the one-rod-out interlock is not OPERABLE in this condition. To ensure only one rod is withdrawn, a new requirement that a control rod block is inserted has been added. This compensates for the inoperable one-rod-out interlock. To ensure no fuel is loaded (since refueling interlocks would preclude fuel movement with a withdrawn control rod), a new requirement that no other CORE ALTERATIONS can be in progress has been added. Surveillances have been added to verify a control rod withdrawal block is inserted every 24 hours and no other CORE ALTERATIONS are in progress every 24 hours.	LCO 3.10.4.c, LCO 3.10.4.d, SR 3.10.4.3, SR 3.10.4.5	N/A
	3.10.5, Multiple Control Rod Withdrawal - Refueling		
M.1	Adds a restriction on fuel assembly movement within the reactor pressure vessel with control rods withdrawn that only allows fuel to be loaded in an approved spiral reload sequence. An Action is provided to suspend fuel loading when the LCO is not met. In addition, adds a new Surveillance Requirement to verify, every 24 hours, fuel assemblies being loaded are in compliance with an approved spiral reload sequence.	LCO 3.10.5.c, 3.10.5 Required Action A.2, SR 3.10.5.3	N/A
	3.10.6, Control Rod Testing - Operating		
NONE	NONE	NONE	NONE
	3.10.7, SDM Test - Refueling		
M.1	Adds a requirement to ensure adequate CRD charging water pressure is available. Also, adds an appropriate Surveillance Requirement.	LCO 3.10.7.f, SR 3.10.7.6	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.2	Revises the requirements of CTS 3.1.A Actions 1 and 2 to require the SDM test to be immediately suspended by placing the reactor mode switch in shutdown or refueling when required APRMs are inoperable.	3.10.7 ACTION B	3.1.A Actions 1 and 2
Current Specification 3/4.12.A, Primary Containment Integrity			
M.1	Deletes Specification that provides an exception, during low power PHYSICS TESTS, to the requirement for maintaining Primary Containment Integrity.	N/A	3/4.12.A
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	unit supervisor 5.1, Responsibility		
M.1	Adds a new requirement that a ~~Senior Reactor Operator (SRO)~~ be responsible for control room command ~~and control~~ function ~~while either unit is in MODES 1, 2 or 3 and an individual with an active SRO or Reactor Operator license be responsible for the control room command function while both units are in MODES 4 or 5 or defueled~~.	5.1.2	NONE
	, except during his absence, and then a designated licensed individual		
	5.2, Organization		
M.1	Adds a requirement that at least one required non-licensed operator be assigned to each unit.	5.2.2.a	6.2.B.1
	5.3, Unit Staff Qualifications		
NONE	NONE	NONE	NONE
	5.4, Procedures		
M.1	Adds requirement that all programs specified in Specification 5.5 have written procedures.	5.4.1.d	N/A
	5.5, Programs and Manuals		
M.1	Modifies the requirement to include Shutdown Cooling (SDC) and Reactor Water Cleanup (RWCU) in the systems addressed by the Reactor Coolant Sources Outside Primary Containment Program.	5.5.2	6.8.D.1
M.2	Adds three new programs, the Component Cyclic or Transient Limit, the Technical Specification (TS) Bases Control Program and the Safety Function Determination Program (SFDP).	5.5.5, 5.5.10, 5.5.11	N/A

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M.3	Adds new requirements to: 1) verify the new fuel oil flash point is within the requirements of the applicable ASTM standard; 2) verify, within 31 days of adding new fuel to the storage tanks, that kinematic viscosity is within limits; and 3) verify, within 31 days of adding new fuel to the storage tanks, that properties other than those specifically addressed are within limits for ASTM fuel.	5.5.9.a.2, 5.5.9.b	4.9.A.5.b, 4.9.A.5.c
	5.6, Reporting Requirements		
M.1	Modifies the Drywell Radiation Monitor inoperability reporting requirements to require the report within 14 days, instead of 30 days, after the restoration time has expired.	5.6.6	Table 3.2.F-1, Action 61b
	5.7, High Radiation Area		
NONE	NONE	NONE	NONE
	Current Specification 6.4, Training		
NONE	NONE	NONE	NONE
	Current Specification 6.7, Safety Limit Violation		
NONE	NONE	NONE	NONE
	Current Specification 6.11, Radiation Protection Program		
NONE	NONE	NONE	NONE
	Current Specification 6.13, Process Control Program		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Combines analog and bistable channel requirements in the CHANNEL FUNCTIONAL TEST definition resulting in an allowance for the bistable channel test signal to be injected "as close to the sensor as practicable" in lieu of "into the sensor."	1.1 CHANNEL FUNCTIONAL TEST definition	1.0	3
L.2	CTS 1.0 states that the DOSE EQUIVALENT I-131 is calculated using the thyroid dose conversion factors found in Table III of TID 14844, "Calculation of Distance Factors for Power and Test Reactor Sites." The ITS allows DOSE EQUIVALENT I-131 to be calculated using any one of three thyroid dose conversion factors; TID-14844 (1962), Table E-7 of Regulatory Guide 1.109, Rev. 1 (1977), or Supplement 1 to ICRP-30 (1980). Using thyroid dose conversion factors other than those given in TID-14844 results in lower doses and higher allowable activity but is justified by the discussion given in the Federal Register (FR page 23360 Vl 56 No 98 May 21, 1991).	1.1 DOSE EQUIVALENT I-131 definition	1.0	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	Changes ~~Deletes~~ the requirement to maintain the reactor vessel water level greater than or equal to 12 inches above the top of active irradiated fuel ~~during operations in MODES 3, 4, and 5~~. to greater than top of active irradiated fuel	~~N/A~~ 2.1.1.3	2.1.D	1
L.2	Deletes directions for the methods of restoring reactor vessel water level (manually initiate the ECCS, after depressurizing the reactor vessel, if required) to allow operator flexibility in determining the best method to restore the reactor vessel water level.	N/A	2.1.D	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	The statement "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance," was added to allow the 1.25 times the interval specified in the Frequency concept to apply to periodic Required Actions.	SR 3.0.2	4.0.B	6
L.2	ITS SR 3.0.3 allows that, at the time it is discovered that the Surveillance has not been performed, the requirement to declare the equipment inoperable (LCO not met) may be delayed for up to 24 hours regardless as to whether the Completion Times of the Actions are 24 hours or less, as is currently allowed in CTS 4.0.C. The second and third paragraphs of ITS SR 3.0.3 are added to clearly state the actions to take if the Surveillance is not performed within the delay period or the Surveillance fails when performed.	SR 3.0.3	4.0.C	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.1, SHUTDOWN MARGIN			
L.1	Revises the requirement to suspend CORE ALTERATIONS "except for control rod insertion and fuel assembly removal" to allow continuation of activities that have a potential to correct the problem and restore a margin of safety to an inadvertent or uncontrolled core criticality.	3.1.1 ACTION E	3.3.A Action 3	4
L.2	Modifies the requirement to insert all insertable control rods in MODE 5 to only require those control rods in core cells containing one or more fuel assemblies to be fully inserted, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity.	3.1.1 Required Action E.2	3.3.A Action 3	4
	3.1.2, Reactivity Anomalies			
L.1	Revises the time allowed to restore the core reactivity difference to within limits (i.e., to "perform an analysis to determine and explain the cause of the reactivity difference") from 12 hours to 72 hours.	3.1.2 ACTION A	3.3.B Action	6
L.2	Replaces the term "CORE ALTERATIONS" with "fuel movement within the reactor pressure vessel or control rod replacement," since the intent of this Surveillance is to verify the core reactivity after in-vessel operations which could have significantly altered the core reactivity.	SR 3.1.2.1	4.3.B.1	3
L.3	Revises the frequency "31 effective full power days" (approximately 689 MWD/T), with "1000 MWD/T during operations in MODE 1."	SR 3.1.2.1	4.3.B.~~1~~ 2	3

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TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.1.3, Control Rod OPERABILITY			
L.1	Revises the requirements for the local distribution of inoperable control rods by 1) adding a Note excluding its applicability above 10% power, 2) deleting actions for inoperable control rods whose position is in conformance with the analyzed rod position sequence (e.g., BPWS) constraints, even if the inoperable control rods are within two cells of each other, and 3) revising the Completion Time from 1 hour to 4 hours to correct the situation prior to commencing a required shutdown.	3.1.3 ACTION D	3.3.C Actions 1.a and 2.a	4, 6
L.2	Revises the Completion Time from 1 hour to 2 hours to insert the control rod.	3.1.3 Required Action A.2	3.3.C Action 1.a.2)	6
L.3	Revises the requirement which verifies control rods to be non-stuck from 7 days to 31 days for control rods that are not fully withdrawn (proposed SR 3.1.3.3).	SR 3.1.3.3	4.3.C.1.a	3
L.4	Revises the time to demonstrate SHUTDOWN MARGIN from 24 hours to 72 hours to provide a reasonable time to perform the analysis or test.	3.1.3 Required Action A.4	3.3.C Action 1.c, 4.3.A.2	6
L.5	Revises the requirement to 1) extend the time allowed to 3 hours (ITS 3.1.3 Required Action C.1) to complete the insertion of all inoperable non-stuck control rods, and 2) add an additional hour to disarm the associated CRD (ITS 3.1.3 Required Action C.2), 1 hour beyond that allowed to insert in recognition of the potential for excessive haste required to complete this task.	3.1.3 Required Action C.1 and C.2	3.3.C Action 2, 3.3.H Action1, 3.3.I Action 1	6
L.6	Deletes the CTS 3.3.D Action 2 requirement for additional scram time surveillance testing when three or more control rods exceed the maximum scram time is deleted. In addition, since the shutdown requirement ("with the provisions of the ACTION(s) above not met, be in at least HOT SHUTDOWN within 12 hours") could have only applied to CTS 3.3.D Action 2 (since a control rod can always be declared inoperable), this part of CTS 3.3.D Action 2 has also been deleted.	N/A	3.3.D Action 2	5

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.7	Deletes the coupling requirements during refueling (OPERATIONAL MODE 5) specified by CTS 3/4.3.H since only one control rod can be withdrawn from core cells containing fuel assemblies.	N/A	3/4.3.H	2
L.8	Allows 3 hours to re-establish coupling for an uncoupled control rod before the control rod must be fully inserted and disarmed. Also, because of the limited time allowed to recouple, removes the restriction on the number of attempts. (NRC CTS has no restriction on number of attempts.)	3.1.3 Required Actions C.1 and C.2	3.3.H Action 1.b	4
L.9	Deletes the CTS 3.3.H Actions 1.a and 1.a.2) requirements since they are not necessary for ensuring recoupling of the control rod.	N/A	3.3.H Actions 1.a and 1.a.2)	4
L.10	Deletes requirement to verify control rod coupling by observing any individual response on nuclear instrumentation during withdrawal of a control rod. SR 3.1.3.5, which requires verification that a control rod does not go to the withdrawn overtravel position, provides adequate assurance that the control rods are coupled.	N/A	3.3.H Action 1.a.1)	3
L.11	Deletes the Surveillances requiring that the control rod position indication system be determined OPERABLE during the performance of the control rod movement tests, since the requirements for the control rod position indication system are adequately addressed by the requirements of ITS 3.1.3 and associated SRs.	N/A	4.3.I.2	3
	3.1.4, Control Rod Scram Times			
L.1	Changes requirement for control rod scram time testing of all control rods prior to exceeding 40% RTP following CORE ALTERATIONS to only requiring testing of affected control rods following any fuel movement within the affected core cell.	SR 3.1.4.4	4.3.D.1.a	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.1.5, Control Rod Scram Accumulators				
L.1	Revises the requirement to declare a control rod with an inoperable accumulator "slow" when reactor pressure is sufficient in lieu of declaring the control rod inoperable. Additionally, with more than one accumulator inoperable, ITS 3.1.5 ACTIONS B and C provide actions similar to ITS 3.1.5 ACTION A, instead of the CTS 3.3.G Action 1.c requirement to declare the associated control rod inoperable immediately.	3.1.5 Required Action A.1, ACTIONS B and C	3.3.G Actions 1.a.2) and 1.c	4
L.2	Revises the requirement to allow 20 minutes to ensure control rod accumulator charging water pressure is adequate to support maintaining the remaining accumulators OPERABLE.	3.1.5 Required Action B.1	3.3.G Action 1.c.1)	4, 6
3.1.6, Rod Pattern Control				
NONE	NONE	NONE	NONE	NONE
3.1.7, Standby Liquid Control System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the SLC System is capable of injecting into the reactor pressure vessel by verifying a flow path and also by firing one of the explosive valves.	SR 3.1.7.8, SR 3.1.7.9	4.4.A.4.a, 4.4.A.4.c	10
3.1.8, SDV Vent and Drain Valves				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the vent and drain valves close in ≤ 30 seconds after receipt of an actual or simulated scram signal; and open when the actual or simulated scram signal is reset.	SR 3.1.8.3	4.3.K.3	10
Current Specification 3/4.3.J, Control Rod Drive Housing Support				
L.1	Deletes the requirement for the Control Rod Drive Housing Support to be in place.	N/A	3/4.3.J	1
Current Specification 3/4.3.N, Economic Generation Control System				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
L.1	The requirement to verify APLHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. In This change addition allows the Applicability to be entered (i.e., ≥ 25% RTP) prior to performing the Surveillance, and therefore, the 4.0.D allowance is not necessary and has been deleted.	SR 3.2.1.1	4.11.A.2, 4.11.A.4	3
L.2	Deletes requirement to verify APLHGRs be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.11.A.3	3
	3.2.2, MINIMUM CRITICAL POWER RATIO			
L.1	The requirement to verify MCPR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. In This change addition allows the Applicability to be entered (i.e., ≥ 25% RTP) prior to performing the Surveillance, and therefore, the 4.0.D allowance is not necessary and has been deleted.	SR 3.2.2.1	4.11.C.2, 4.11.C.4	3
L.2	Deletes requirement to verify MCPR be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.11.C.3	3
	3.2.3, LINEAR HEAT GENERATION RATE			

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.1	The requirement to verify LHGR within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. In This change ~~addition,~~ allows the Applicability to be entered (i.e., ≥ 25% RTP) prior to performing the Surveillance, and therefore, the 4.0.D allowance is not necessary and has been deleted.	SR 3.2.3.1	4.11.D.2, 4.11.D.4	3
L.2	Deletes requirement to verify LHGRs be within the limits initially and every 12 hours when operating at a LIMITING CONTROL ROD PATTERN, since it is superfluous as it would not be evident that a LIMITING CONTROL ROD PATTERN has been achieved until the Surveillance is performed.	N/A	4.11.D.3	3
	3.2.4, APRM GAIN AND SETPOINT			
L.1	Deletes CTS action requirement to (1) ensure that the adjusted APRM reading does not exceed 100% of RATED THERMAL POWER and (2) post a notice of adjustment on the reactor control panel whenever APRM gain is adjusted so that the APRM readings are greater than or equal to 100% times FRTP times FDLRC.	N/A	3.11.B Action 3 and footnote (a)	4
L.2	The requirement to verify FDLRC within limits within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER is relaxed to once within 12 hours after greater than or equal to 25% RTP. In This change ~~addition,~~ allows the Applicability to be entered (i.e., ≥ 25% RTP) prior to performing the Surveillance, and therefore, the 4.0.D allowance is not necessary and has been deleted.	SR 3.2.4.1	4.11.B.2, 4.11.B.4	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.3.1.1, RPS Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the RPS LOGIC SYSTEM FUNCTIONAL TEST and the RPS RESPONSE TIME TEST.	SR 3.3.1.1.18, SR 3.3.1.1.19	4.1.A.2, 4.1.A.3	10
LD.2	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST for the Reactor Mode Switch—Shutdown Position Function.	SR 3.3.1.1.16	4.1.A.1 for Table 4.1.A-1 Functional Unit 13	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.1.1.17 for Table 3.3.1.1-1 Functions 1.a, 4, 5, 7.b, 8, and 9	4.1.A.1 for Table 4.1.A-1 Functional Units 1.a, 4, 5, 8.a, 9, and 11	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy") or NEDC-31366P-A, "General Electric Instrument Setpoint methodology."	Table 3.3.1.1-1	Table 2.2.A-1	1
L.1	Adds an allowance to exclude neutron detectors from the RPS RESPONSE TIME TESTING due to the difficulties of simulating a meaningful signal. The principles of detector operation virtually ensure an instantaneous response time.	SR 3.3.1.1.19 Note 1	N/A	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

L.2	Deletes the IRM, APRM, Reactor Mode Switch Shutdown Position, and Manual Scram requirements for MODES 3 and 4 (APRM - MODE 3 only). During normal operation in MODES 3 and 4, all control rods are fully inserted and the Reactor Mode Switch Shutdown position control rod withdrawal block (ITS 3.3.2.1) does not allow any control rod to be withdrawn.	N/A	Tables 3.1.A-1 and 4.1.A-1 Functional Units 1, 2.a, 2.d, 13, and 14, Table 3.1.A-1 Actions 12, 17, and 18	1
L.3	CTS requirements for IRM Neutron Flux—High, IRM Inoperative, Reactor Mode Switch Shutdown Position, and Manual Scram to be OPERABLE in MODE 5 are replaced with ITS requirements for these Functions to be OPERABLE in MODE 5 when a control rod is withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability. CTS Action 19, to lock the reactor mode switch in Shutdown, is also deleted. Once the control rods are inserted, the RPS Functions are no longer required to be OPERABLE, thus there is no need to place the reactor mode switch in Shutdown.	Table 3.3.1.1-1 Note (a), 3.3.1.1 ACTION H	Tables 3.1.A-1 and 4.1.A-1 Functional Units 1.a, 1.b, 13, and 14, Table 3.1.A-1 Actions 13 and 19	2, 8
L.4	The CTS Scram Discharge Volume Water Level Trip Function Applicability is modified from requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn to only requiring the Function to be OPERABLE in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. Conforming ITS ACTION H requirements are included for consistency with the proposed ITS Applicability.	Table 3.3.1.1-1 Functions 7.a and 7.b, including Note (a), 3.3.1.1 ACTION H	Table 3.1.A-1 Functional Units 8.a and 8.b, including footnotes (b) and (i), Table 4.1.A-1 Functional Units 8.a and 8.b, including footnotes (j) and (k), Table 3.1.A-1 Action 13	2

5 and 19

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

L.5	The requirement in CTS Table 3.1.A-1 Actions 13 and 19 requiring the suspension of LPRM replacement if SRM instrumentation is not OPERABLE per CTS 3.10.B has been deleted since the ITS Required Actions are adequate to minimize the reactivity of the core whenever required Functions (IRMs, APRMs, Scram Discharge Volume Water Level, Reactor Mode Switch Shutdown Position, and Manual Scram) are inoperable concurrent with SRM inoperabilities.	N/A	Table 3.1.A-1 Actions 13 and 19	4
L.6	The CTS Table 3.1.A-1 Action 16 requirement to initiate a reduction in THERMAL POWER within 15 minutes has been deleted, since immediate power reduction may not always be the conservative method to assure safety.	N/A	Table 3.1.A-1 Action 16	4
L.7	ITS provides an exception to Operability requirements for performing specified APRM heat balance calibration until 12 hours after THERMAL POWER greater than or equal to 25% RTP.	SR 3.3.1.1.2	Table 4.1.A-1 footnote (d)	3
L.8	Relaxation of CHANNEL CALIBRATION Surveillance Frequency for the reactor recirculation flow portion of Functional Unit 2.b, APRM Flow Biased Neutron Flux—High from 184 days to 24 months.	SR 3.3.1.1.17 for Table 3.3.1.1-1 Function 2.b, SR 3.3.1.1.15 Note 3	4.1.A.1 for Table 4.1.A-1 Functional Unit 2.b	3
L.9	Extends the time to reach < 45% RTP from 2 hours to 4 hours.	3.3.1.1 Required Action E.1	Table 3.1.A-1 Action 16	6
L.10	Deletes the response time for the Manual Scram, Reactor Mode Switch Shutdown Position, IRMs, APRM Neutron Flux Setdown, APRM Inoperable and Scram Discharge Volume Water Level, since they are not assumed in any accident analysis. 2	N/A	4.1.A.3 for Table 3.1.A-1 Functional Units 1.a, 1.b, 2.a, 2d, 7.a, 7.b, 11, and 12	3
L.11	Deletes the requirement to post a notification on the reactor control panel if any required APRM must be adjusted to be within 2% of RATED THERMAL POWER.	N/A	Table 4.1.A-1 footnote (d)	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

3.3.1.2, SRM Instrumentation				
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the SRM CHANNEL CALIBRATION.	SR 3.3.1.2.7	4.2.G.4	10
L.1	CTS only specifies an action for one required SRM inoperable during MODE 2; therefore, a plant shutdown is required (per CTS 3.0.C) if two or more required SRMs become inoperable. The words "or more" are added (ITS 3.3.1.2 Condition A) to allow the action to apply to two or three inoperable SRMs (i.e., allow 4 hours to restore the inoperable SRMs). Additionally, with no OPERABLE SRMs, the ability to monitor positive reactivity changes is significantly restricted, thus a new Action is added in the ITS to ensure that no further control rod withdrawal is allowed.	3.3.1.2 Condition A, 3.3.1.2 ACTION B	N/A	5
L.2	Deletes the CTS requirement to "lock" the mode switch in Shutdown.	N/A	3.2.G Action 2	8
L.3	Deletes the "prior to" frequency from CTS Surveillances involving prior to startup, withdrawing control rods, and performing CORE ALTERATIONS. These additional Surveillance Frequencies are redundant to CTS 3.0.A and CTS 4.0.D .	SR 3.3.1.2.6, SR 3.3.1.2.5, SR 3.3.1.2.~~4~~ 8	4.2.G.3.a, 4.10.B.2.a, 4.10.B.3.a	3
L.4	The CTS requires verifying SRM count rate is at least 3 cps. The ITS allows SRM count rate to be below 3 cps with less than or equal to four fuel assemblies adjacent to the SRM provided no other fuel assemblies are located in the associated core quadrant.	SR 3.3.1.2.4 Note	4.10.B.3	3
L.5	Revises the CTS Action to immediately "...insert all insertable control rods" to "initiate action to insert all insertable control rods...." During MODE 5, it may not be possible to immediately insert all insertable control rods; therefore the ITS provides a Required Action to immediately initiate action and continue attempts to insert all insertable control rods.	3.3.1.2 Required Action E.2	3.10.B Action	4

L.6	Modifies the requirement to fully insert all insertable control rods in MODE 5 if one or more required SRMs are inoperable to only require those control rods in core cell containing one or more fuel assemblies, since with all fuel assemblies removed from a core cell, inserting the associated control rod has a negligible impact on core reactivity.	3.3.1.2 Required Action E.2	3.10.B Action	4
L.7	Adds a Note that eliminates requirements for SRMs outside the fueled region to be Operable in MODE 5, during a spiral offload or reload, since monitors in these positions are not capable of monitoring normal changes in neutron flux. Similarly, SRM count rate requirements are deleted.	Table 3.3.1.2-1 Note (b)	4.10.B.1.c	1
L.8	Modifies the SRM count rate requirement to allow count rate to be as low as 0.7 cps, provided the signal-to-noise ratio is ≥ 20:1. The optional count rate of at least 0.7 cps with a signal to noise ratio ≥ 20:1 is acceptable since the SRMs could still monitor neutron counts with the same confidence as in the current value.	SR 3.3.1.2.4	4.2.G.1, 4.10.B.3	3
3.3.2.1, Control Rod Block Instrumentation				
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy") or NEDC-31366P-A, "General Electric Instrument Setpoint methodology."	Table 3.3.2.1-1	Table 3.2.E-1	1
L.1	Deletes the requirement to perform the CHANNEL FUNCTIONAL TEST of the RBM "within 24 hours prior to startup," since the normal 92 day periodic Surveillance Frequency provides adequate assurance that the RBM Functions are Operable.	N/A	Table 4.2.E-1 Functional Unit 1 "S/U" and footnote (b)	3
L.2	CTS requirements for RWM Channel Functional Testing are modified. ITS SRs extend the CHANNEL FUNCTIONAL TEST to 92 days. ITS Notes extend the time, for up to 1 hour, to perform the RWM CHANNEL FUNCTIONAL TEST after any control rod is withdrawn at ≤ 10% RTP in MODE 2 and after THERMAL POWER is ≤ 10% RTP in MODE 1.	SR 3.3.2.1.2 including Note, SR 3.3.2.1.3 including Note	4.3.L.2, 4.3.L.3	3

L.3	Deletes CTS Action that requires verification that the reactor is not operating on a LIMITING CONTROL ROD PATTERN when one RBM channel is inoperable, and deletes the Surveillance Requirement that requires a CHANNEL FUNCTIONAL TEST prior to control rod withdrawal when the reactor is operating on a LIMITING CONTROL ROD PATTERN.	N/A	3.3.M Action 1.a, 4.3.M.2	3, 4
L.4	Reduces the Applicability for RWM OPERABILITY from ≤ 20% RTP to ≤ 10% RTP.	3.3.2.1, Table 3.3.2.1-1 Function 2, footnote (b)	3.3.L Applicability	2
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.2.2.5	4.2.J.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.2.2.4	4.2.J.1 for Table 4.2.J-1 Functional Unit	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoint to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.2.2.4	Table 3.2.J-1	1
L.1	Modifies the Applicability for the Feedwater System and Main Turbine Water Level Trip Instrumentation from MODE 1 to when THERMAL POWER is ≥ 25% RTP, and the current shutdown action to only require power to be reduced to < 25% RTP. In addition, the time to achieve this power level has been reduced from 8 hours to 4 hours.	3.3.2.2 Applicability, 3.3.2.2 ACTION C	3.2.J Applicability, Table 3.2.J-1 Action 90.b	2, 5, 6

L.2	CTS requires reduction in Thermal Power if the Feedwater System Main Turbine High Water Level Trip Instrumentation is not restored to Operable status. ITS adds a Required Action to allow removal of the associated feedwater pump(s) from service in lieu of reducing Thermal Power. This Required Action will only be used if the instrumentation is inoperable solely due to an inoperable feedwater pump breaker.	3.3.2.2 Required Action C.1	N/A	5
3.3.3.1, Post Accident Monitoring Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION.	SR 3.3.3.1.5	4.2.F.1 for Table 4.2.F-1 Instrumentation 2 (analog transmitters only), 5, and 12	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.3.1.5	4.2.F.1 for Table 4.2.F-1 Instrumentation 2 (analog transmitters only), 5, and 12	10
L.1	Adds a Note that LCO 3.0.4 is not applicable to the ITS 3.3.3.1 ACTIONS.	3.3.3.1 ACTIONS Note 1	N/A	7
L.2	Adds a Note to allow a channel to be inoperable for up to 6 hours solely for performance of required Surveillances provided the other channel in the associated Function is OPERABLE.	3.3.3.1 Surveillance Requirements Note 2	N/A	6
L.3	The CTS Actions for one channel inoperable in one or more Functions for more than the allowed outage time is revised from requiring a shutdown to requiring a Special Report.	3.3.3.1 ACTION B	Table 3.2.F-1 Actions 60.a and 62.a	5

L.4	In the event the number of OPERABLE channels is less than the Minimum Channels OPERABLE requirement, the CTS requires the inoperable channels to be restored within 48 hours. The ITS extends this Completion Time to 7 days.	3.3.3.1 ACTION C	Table 3.2.F-1 Action 60.b	6
L.5	With one or two drywell area radiation monitors inoperable, the CTS requires initiation of the alternate method of monitoring within 72 hours and restoration of both channels to OPERABLE status within 7 days. With one monitor inoperable, the ITS provides 30 days for the restoration of the monitor prior to initiating the action in accordance with Specification 5.6.6 and with two monitors inoperable, provides 7 days for restoration of one monitor prior to initiating action in accordance with Specification 5.6.6.	3.3.3.1 ACTIONS A, B, C, D, and F	Table 3.2.F-1 Action 61	5, 6
L.6	Changes the Applicability requirement for Drywell Area Radiation Monitors from MODES 1, 2, and 3 to MODES 1 and 2.	3.3.3.1 Applicability	Table 3.2.F-1 and 4.2.F-1 for Instrumentation 12	2
3.3.4.1, ATWS-RPT Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.4.1.5	4.2.C.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.4.1.4	4.2.C.1 for Table 4.2.C-1 Functional Units 1 and 2	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.4.1.4	Table 3.2.C-1	1

L.1	CTS require the unit to be in Mode 2 if the ATWS-RPT instrumentation is not restored. ITS will allow removal of the associated recirculation pump from service in lieu of being in MODE 2 within 6 hours.	3.3.4.1 Required Action D.1	N/A	5
L.2	When two reactor vessel water level channels or two reactor vessel pressure channels in the same Trip System are inoperable, in place of the CTS requirement to restore the inoperable channels, the ITS provides an option to place inoperable channels in the tripped condition, conservatively compensating for the inoperable status, restoring the single failure capability and providing the required initiation capability of the instrumentation.	3.3.4.1 ACTION A	3.2.C Action 3	4
L.3	CTS requires that when one Trip System is inoperable, 72 hours are provided to restore the Trip System. CTS also requires that when both Trip Systems are inoperable, 1 hour is provided to restore one Trip System. The ITS addresses trip Function capability, not Trip System capability, providing a 72 hour Completion Time to restore trip capability when one Function has lost ATWS-RPT trip capability and a 1 hour Completion Time when both Functions have lost ATWS-RPT trip capability. A trip Function is maintained when sufficient channels are Operable or in trip, such that the ATWS- RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped. This requires two channels of the Function, in the same trip system, to each be Operable or in trip. ITS extends the time for repair to 14 days when either the pressure or level functions are inoperable in one trip system provided the other trip system retains trip capability.	3.3.4.1 ACTIONS B and C	3.2.C Actions 5 and 6	1, 6
	3.3.5.1, ECCS Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for HPCI Manual Initiation and ADS Initiation Timer and Low Low Water Level Actuation Timer Functions.	SR 3.3.5.1.6	4.2.B.2, 4.2.B.1 for Table 4.2.B-1 Functional Units 3.g, 4.c, and 4.d	10

LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.5.1.5	4.2.B.1 for Table 4.2.B-1 Functional Units 1.a, 1.d, 2.a, 2.d, 3.a, 3.c, 3.e, 4.a, 4.c, and 4.d	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.5.1-1	Table 3.2.B-1	1
L.1	CTS Table 3.2.B-1 Action 32, which applies to Functional Units 1.c and 2.c (Reactor Vessel Pressure-Low (Permissive) Functions) in MODES 4 and 5, requires the channels to be placed in the tripped condition within 24 hours. If this Action is not performed, CTS 3.2.B does not provide default actions, thus CTS 3.0.C appears to be applicable. However, CTS 3.0.C does not apply in MODES 4 and 5, therefore 10 CFR 50.36(c)(2) requires that the licensee notify the NRC if required by 10 CFR 50.72 and a Licensee Event Report (LER) be submitted to the NRC as required by 10 CFR 50.73. In the ITS an alternate action has been added to declare the associated supported subsystems inoperable. In this condition, the ITS will require the associated supported subsystems to be declared inoperable immediately.	3.3.5.1 ACTION H	Table 3.2.B-1 Action 32 for Functional Units 1.c and 2.c	4
	3.3.5.2, IC System Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.5.2.4	4.2.D.2	10
LE.1	Relaxation of Surveillance Frequency from 92 days to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.5.2.3	4.2.D.1 for Table 4.2.D-1	10

LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoint to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.5.2.2	Table 3.2.D-1	1
	3.3.6.1, Primary Containment Isolation Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and the CHANNEL FUNCTIONAL TEST for MSL Tunnel Temperature—High, SLC System Initiation, and HPCI Area Temperature—High Functions.	SR 3.3.6.1.5, SR 3.3.6.1.7	4.2.A.2, 4.2.A.1 for Table 4.2.A-1 Functional Units 3.e, 4.a, and 6.c	10
LE.1	Relaxation of Surveillance Frequency from 92 days and 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.1.6	4.2.A.1 for Table 4.2.A-1 Functional Units 1.a, 1.c, 3.a, 3c, 3.e, 4.b, 6.a, 6.b, 6.c, 7.a, and 7.b	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.6.1-1	Table 3.2.A-1	1
L.1	CTS Table 3.2.A-1 Action 23 requires the affected system isolation valves to be closed within one hour. If this action were not met entry into CTS 3.0.C is required and the plant must within one hour take action to place the unit in a MODE in which the Specification does not apply by placing the plant in MODE 3 in the next 12 hours, and be in at least MODE 4 within the subsequent 24 hours. In lieu of a CTS 3.0.C shutdown, the ITS provides a shutdown to MODE 4 within the Primary Containment Isolation Instrumentation Specification.	3.3.6.1 ACTION G	CTS 3.0.C	4

L.2	The Applicability of the SLC System Initiation Function has been modified from MODES 1, 2, and 3 to MODES 1 and 2, consistent with the SLC System requirements. In addition, the ITS allows the associated SLC subsystem to be declared inoperable in lieu of isolating the RWCU System, as required by the CTS when one or more channels of the SLC System Initiation Function are inoperable and not tripped.	Table 3.3.6.1-1 Function 5.a, 3.3.6.1 ACTION H	Tables 3.2.A-1 and 4.2.A-1 Functional Unit 4.a, Table 3.2.A-1 Action 23	2, 4
L.3	The CTS action, associated with the Reactor Vessel Water Level—Low Function, to close the affected system isolation valves within one hour and declare the affected system inoperable has been modified to immediately initiate action to restore channel to OPERABLE status or initiate action to isolate the Shutdown Cooling System.	3.3.6.1 ACTION I	Table 3.2.A-1 Action 23	5
L.4	CTS Table 3.2.A-1 Action 21, which requires the unit to be in STARTUP (Mode 2) with the associated isolation valves closed within 8 hours, is being changed to only require isolation of the associated main steam line within 12 hours. The time allowed to isolate the associated main steam lines is extended from 8 hours to12 hours to allow for more orderly power reduction.	3.3.6.1 ACTION D	Table 3.2.A-1 Action 21	5, 6
L.5	The Shutdown Cooling System isolations on low water level in MODES 4 and 5 are provided to mitigate a vessel draindown event. However, in MODES 4 and 5 an intact Shutdown Cooling System fulfills the function of redundant capability of isolation instrumentation. Therefore, in the ITS, only one channel per trip system, with an isolation signal available to one shutdown cooling suction isolation valve, is required provided system integrity is maintained.	Table 3.3.6.1-1 Note (b)	Table 3.2.A-1 Functional Unit 7.a	1
3.3.6.2, Secondary Containment Isolation Instrumentation				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.6.2.6	4.2.A.2, 4.7.P.4.b	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.2.5	4.2.A.1 for Table 4.2.A-1 Functional Unit 2.a	10

LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.6.2-1	Table 3.2.A-1	1
L.1	Isolation of secondary containment on Reactor Vessel Water Level—Low is required by the CTS to be Operable during CORE ALTERATIONS. The ITS does not include the Applicability of CORE ALTERATIONS for this Function, since automatic secondary containment isolation capabilities on reactor vessel water level decreases are not necessary during CORE ALTERATIONS.	N/A	Tables 3.2.A-1 and 4.2.A-1 Functional Unit 2.a, including footnote *	2
L.2	ITS includes Required Actions to require declaring the affected components inoperable and taking the appropriate actions in the associated Secondary Containment Isolation Valve or SGT Systems Specification if the associated penetrations and SGT subsystems are not placed in the proper condition within 1 hour. Currently, a CTS 3.0.C entry would be required, since no further Actions are provided.	3.3.6.2 Required Actions C.1.2 and C.2.2	Table 3.2.A-1 Action 24	4, 5
	3.3.6.3, Relief Valve Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the LOGIC SYSTEM FUNCTIONAL TEST and CHANNEL FUNCTIONAL TEST portion of the CHANNEL CALIBRATION (for the Low Set Relief Valve Reactuation Time Delay Function only).	SR 3.3.6.3.3	4.6.F.1.b, 4.6.F.1.a	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.6.3.2	4.6.F.1.b for the Low Set Relief Valve Reactuation Time Delay Function	10

LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.6.3-1	3.6.F	1
	3.3.7.1, CREV System Instrumentation			
NONE	NONE	NONE	NONE	NONE
	3.3.8.1, Loss of Power Instrumentation			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST.	SR 3.3.8.1.3, SR 3.3.8.1.5	4.2.B.1 for Table 4.2.B-1 Functional Unit~~s~~ 5.a ~~and 5.b~~, 4.2.B.2	10
LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.8.1.~~2~~ 4	4.2.B.1 for Table 4.2.B-1 Functional Unit~~s~~ 5.a ~~and 5.b~~	10
LF.1	Revises the Current Technical Specifications (CTS) Trip Setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	Table 3.3.8.1-1	Table 3.2.B-1	1
	3.3.8.2, RPS Electric Power Monitoring			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the system functional test.	SR 3.3.8.2.3	4.9.G.2	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

LE.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the CHANNEL CALIBRATION.	SR 3.3.8.2.2	4.9.G.2	10
LF.1	Revises the Current Technical Specifications (CTS) setpoints to be consistent with the methods described in ComEd's Instrument Setpoint Methodology (Nuclear Engineering Standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy").	SR 3.3.8.2.2	4.9.G.2.a, 4.9.G.2.b, 4.9.G.2.c	1
L.1	Changes the Applicability from MODES 1, 2, and 3 and MODES 4 and 5 with any control rod withdrawn to only include MODES 1 and 2 and MODE 5 with any control rod withdrawn, consistent with the Applicability of the RPS Instrumentation, which is the equipment required to be protected by the RPS Electric Power Monitoring Assemblies. In addition, modifies CTS 4.9.G footnote (b) to require performance of the Channel Functional Test Surveillance prior to entry into MODE 2, consistent with the change to the Applicability.	3.3.8.2 Applicability, SR 3.3.8.2.1 Note	3.9.G Applicability, 4.9.G footnote (b)	2
L.2	Extends the allowed out of service time for two inoperable RPS electric power monitoring assemblies from 30 minutes to 1 hour to provide sufficient time for plant personnel to take corrective actions.	3.3.8.2 Required Action B.1	3.9.G Action 2	6
L.3	The CTS Applicability is modified from requiring RPS Electric Power Monitoring to be OPERABLE in MODE 5 with any control rod withdrawn to only requiring RPS Electric Power Monitoring to be OPERABLE in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies.	3.3.8.2 Applicability	3.9.G footnote (a)	2
L.4	The CTS does not provide any actions if the RPS EPAs are not restored or the associated RPS MG set or alternate power supply is not removed from service (which de-energizes the associated RPS bus). Thus, CTS 3.0.~~[illegible]~~ C is required to be entered. However, since CTS 3.0.~~[illegible]~~ C is not applicable in MODE 5, 10 CFR 50.36(c)(2) requires that the licensee notify the NRC if required by 10 CFR 50.72, and a Licensee Event Report (LER) be submitted to the NRC as required by 10 CFR 50.73. In lieu of these two requirements, the ITS provides a new ACTION if the Required Actions of Condition A or B are not met in MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. The ITS requires action to be initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	3.3.8.2 ACTION D	N/A	5

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

Current Specification 3/4.2.H, Explosive Gas Monitoring				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.4.1, Recirculation Loops Operating			
L.1	Deletes the explicit requirement in CTS 3.6.A Action 1.e to electrically prohibit the idle recirculation pump from starting except to permit testing in preparation for returning the pump to service.	N/A	3.6.A Action 1.e	4
L.2	Replaces the required action of CTS 3.6.C Action 2 to trip one of the recirculation pumps when the speed mismatch (i.e. flow mismatch) is not within limits with a requirement (ITS 3.4.1 ACTION B) to declare the loop with the low flow "not in operation." Once the declaration has been made, the appropriate actions for single loop operation must be taken in accordance with CTS 3.6.A.1 (ITS 3.4.1).	3.4.1 ACTION B	3.6.C Action 2	4
L.3	CTS 4.6.C requires the recirculation pump speed mismatch (i.e., jet pump loop flow mismatch in ITS) to be verified within the limits once per 24 hours when in Operational MODES 1 and 2 during two recirculation loop operation. Since CTS 4.6.C cannot be performed prior to its Applicability (as required by CTS 4.0.D) if shifting from single loop to two loop operation while in MODE 1 or 2, a note is added providing an allowance for time to initiate Frequency to avoid intentional entry into the ACTIONS each time the second recirculation pump is started.	SR 3.4.1.1 Note	N/A	3
L.4	CTS 3.6.C requires the recirculation pump speeds to be maintained within prescribed limits. With THERMAL POWER ≥ 80% of RATED THERMAL POWER the recirculation pump speeds must be within 10% of each other, and with THERMAL POWER < 80% of RATED THERMAL POWER, recirculation pump speeds must be within 15% of each other. In proposed SR 3.4.1.1, the jet pump loop flow mismatch with both recirculation loops in operation is: ≤ 10% of rated core flow when operating at < 70% of rated core flow; and ≤ 5% of rated core flow when operating at ≥ 70% of rated core flow.	SR 3.4.1.1	3.6.C	~~3~~ 1
	3.4.2, Jet Pumps			

3.6.B

L.1	Deletes the requirements of CTS 3.6.B and associated Action 2 concerning jet pump flow indication since it does not necessarily relate directly to the structural integrity of the jet pumps.	N/A	3.6.B, Action 2	1, 4
L.2	Adds a Note to CTS 4.6.B.1 and CTS 4.6.B.2 (proposed SR 3.4.2.1 Note 1), to allow a 4-hour delay in performance of the Surveillance after the associated recirculation loop is restored to operation. The Note allows the Surveillance not to be performed until four hours after the associated recirculation loop is in operation, because these checks can only be performed during jet pump operation (i.e., when the loop is in operation).	SR 3.4.2.1 Note 1	N/A	3
	3.4.3, Safety and Relief Valves			
L.1	Deletes the requirement of CTS 3.6.F Action 1 for an open relief valve to be closed provided the suppression pool temperature is <110°F. If unable to close the open relief valve, or if suppression pool temperature is ≥ 110°F, the reactor mode switch must be placed in shutdown.	N/A	3.6.F Action 1	4
	3.4.4, RCS Operational Leakage			
L.1	Extends the Surveillance Frequency for verifying the RCS operational leakage is within limits from "8 hours not to exceed 12 hours" to "12 hours."	SR 3.4.4.1	4.6.H.2	3
	3.4.5, RCS Leakage Detection Instrumentation			
NONE	NONE	NONE	NONE	NONE
	3.4.6, RCS Specific Activity			
NONE	NONE	NONE	NONE	NONE

3.4.7, Shutdown Cooling System - Hot Shutdown				
L.1	Adds Notes making LCO 3.0.4 and SR 3.0.4 not applicable to provide the necessary time to place the system in service following the reduction of pressure to below the cut-in permissive pressure setpoint, since the system cannot be placed in service until the suction valves high pressure closure interlock is cleared.	3.4.7 ACTION Note 1, SR 3.4.7.1 Note	N/A	7
L.2	CTS 3.6.O footnote (a) allows one shutdown cooling (SDC) loop to be inoperable for 2 hours provided the other loop is OPERABLE and in operation. CTS 3.6.O footnote (b) allows the shutdown cooling pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is OPERABLE. The requirements are changed to delete the "provided" requirements.	LCO 3.4.7 Notes 1 and 2	3.6.O footnotes (a) and (b)	1
3.4.8, Shutdown Cooling System - Cold Shutdown				
L.1	CTS 3.6.P footnote (a) allows one SDC loop to be inoperable for 2 hours provided the other loop is OPERABLE and in operation. CTS 3.6.P footnote (b) allows the SDC pump to be removed from operation for up to 2 hours per 8 hour period, provided the other loop is OPERABLE. The requirements are changed to delete the "provided" requirements.	LCO 3.4.8 Notes 1 and 2	3.6.P footnotes (a) and (b)	1
3.4.9, RCS Pressure and Temperature (P/T) Limits				
L.1	CTS 4.6.K.2.a requires the rate of change of primary system coolant temperature to be determined within limits 15 minutes prior to withdrawal of control rods and at least once per 30 minutes during primary system heatup or cooldown. The requirement to verify the rate of change during the 15 minute period prior to withdrawal of control rods has been deleted, however, the Frequency of once every 30 minutes has been retained as proposed in SR 3.4.9.1 during heatup and cooldown.	N/A	4.6.K.2.a	3

L.2	CTS 3.6.K Action 2 and the CTS 3.6.D Action specify a Completion Time of 72 hours for the required engineering evaluation with an LCO applicability of "at all times." Proposed ITS 3.4.9, Required Action C.2, (applicable when in conditions other than MODES 1, 2, and 3) requires completion "prior to entering MODE 2 or 3." While Required Action C.2 is intended to be initiated without delay, it is not restricted to a specified Completion Time, only by a restriction on returning to (entering) operating MODES (i.e., 1, 2, or 3) where additional stresses (heatup/criticality) may be imposed.	3.4.9 Required Action C.2	3.6.K Action 2, 3.6.D Action	6
3.4.10, Reactor Steam Dome Pressure				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.6.N, Structural Integrity				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.5.1, ECCS-Operating			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the following Surveillances: Verification of HPCI system flow, verification that ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal; verification that ADS actuates on an actual or simulated automatic initiation signal; and manually opening each required ADS valve.	SR 3.5.1.7, SR 3.5.1.8, SR 3.5.1.9, SR 3.5.1.10	4.5.A.3.a, 4.5.A.3.b.1), 4.5.A.3.b.2), 4.5.A.4.a, 4.5.A.4.b	10
L.1	Reduces the number of ADS valves required to be OPERABLE in CTS 3.5.A.4 from five to four based on the analysis summarized in the UFSAR.	LCO 3.5.1	3.5.A.4, 4.5.A.4.b	1
L.2	Deletes the ECCS discharge line keep fill alarm instrumentation, since ITS does not specify alarm-only equipment to be OPERABLE to support OPERABILITY of a system or component.	N/A	~~3.5.A Action 5,~~ 4.5.A.3.c	3, 4
L.3	Adds ITS 3.5.1 ACTION G for the condition of HPCI inoperable coincident with one low pressure coolant injection /spray subsystem (or one LPCI pump in each subsystem) inoperable. The current Technical Specifications require entry into Specification 3.0.C (ITS LCO 3.0.3) for these conditions, implying that the plant is outside design basis. The analyses summarized in the UFSAR demonstrate that adequate core cooling is provided by the OPERABLE HPCI ADS and the remaining OPERABLE low pressure injection/spray systems.	3.5.1 ACTION G	N/A	5
L.4	Elimination of the requirement to submit a Special Report for ECCS actuation and injection as it is adequately addressed by 10 CFR 50.73(a)(2)(iv).	N/A	3.5.A Action 7	9
	3.5.2, ECCS-Shutdown			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the Surveillance that verifies the CS and LPCI functional test on an actual or simulated automatic initiation signal.	SR 3.5.2.5	4.5.B	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND IC SYSTEM

L.1	Deletion of requirements to: 1) suspend CORE ALTERATIONS when both ECCS subsystems are inoperable; and 2) suspend CORE ALTERATIONS when the suppression pool water level requirement is not within limit.	N/A	3.5.B Action 2, 3.5.C Action 2	4
L.2	Relaxes the limitation in CTS 3.5.C if the water source is only available from the CCST and OPDRVs are in progress. If OPDRVs are in progress only one ECCS subsystem is allowed to credit the CCST as indicated in proposed Note to SR 3.5.2.1.b, therefore, one ECCS subsystem must be declared inoperable. This is necessary since the available volume is limited. This will therefore limit the time that OPDRVs can be performed, since an ECCS subsystem must be declared inoperable and ITS 3.5.2 Required Action A.1 only provides 4 hours to restore the inoperable ECCS subsystem to OPERABLE status prior to suspending OPDRVs. Therefore, when credit is being taken for the CCST and the suppression pool level is not within limits operations must be in accordance with ITS 3.5.2 ACTIONS A and B, where the Required Action of Condition B precludes OPDRVs (note that Condition B applies 4 hours after Condition A, i.e., one ECCS subsystem inoperable, is entered).	3.5.2, 3.5.2 Required Action A.1, SR 3.5.2.1.b Note	3.5.C, 3.5.C Action 2	5
L.3	Deletes the requirement to "lock" the reactor mode switch in shutdown when the suppression pool is not within the required limit. The position of the reactor mode switch is controlled by the MODES definition Table.	N/A	3.5.C.2.b, 3.5.C Action 2	8
L.4	Revises CTS 4.5.C.2.b, the verification that the requirements in CTS 3.5.C.2 are satisfied every 12 hours when the suppression chamber water level limit is not met, to only require the Surveillances to be verified at the current specified frequencies not at this 12 hour frequency.	SR 3.5.2.1.b	4.5.C.2.b	3
L.5	Decrease condensate storage tank water level requirement from 140,000 available gallons to 50,000 available gallons.	SR 3.5.2.1.b	3.5.B.1.a.2), 3.5.B.2.b.2), 3.5.C.2.c	1, 3
3.5.3, IC System				
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the Surveillance that provides an IC system functional test.	SR 3.5.3.3	4.5.D.3	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.6.1.1, Primary Containment			
LD.1	Relaxation of routine Surveillance Frequency from 18 months to 24 months and relaxation of additional tests required if routine test fails two times in a row from 9 months to 12 months for performing the drywell-to-suppression chamber bypass leakage test.	SR 3.6.1.1.2	4.7.K.5	10
L.1	In the ITS presentation, drywell-to-suppression chamber bypass leakage outside limits will result in declaring the Primary Containment inoperable, requiring commencing a shutdown to MODES 3 and 4 if the leakage problem is not corrected within 1 hour. With the drywell-to-suppression chamber bypass leakage outside of limits in MODE 1, 2, or 3, the CTS does not provide actions. Since drywell-to-suppression chamber leakage are attributes of maintaining Primary Containment Integrity, a 1 hour allowed outage time is provided for this condition consistent with the primary containment ~~is~~ being inoperable.	3.6.1.1 ACTION A	~~3.0.C~~ N/A NRC 3.0.C Not in DOC L.3 or CTS markup	6
L.2	Deletes the requirement for the NRC to review the test schedule for subsequent tests if any drywell-to-suppression chamber bypass leakage rate test result is not within the required limits since the NRC has already approved the test schedule in the Technical Specification.	N/A	4.7.K.5	9
L.3	Not used.	N/A	N/A	N/A
	3.6.1.2, Primary Containment Air Lock			
L.1	Adds ITS ACTIONS Note to allow entry through a closed or locked air lock door for the purpose of making repairs. The proposed allowance will have strict administrative controls, which are detailed in the Bases.	3.6.1.2 ACTIONS Note 1	3.7.C Actions	4
L.2	~~Not used.~~ INSERT L.2	~~N/A~~ 3.6.1.2 Required Actions A.1 and C.2	~~N/A~~ 3.7.C Actions 1.a and 3	6 ~~N/A~~

NRC See Comment 3

INSERT L.2

In reference to the CTS action to immediately maintain an air lock door closed, changes the word "maintain" to "verify" and 1 hour is allowed to complete the verification in the ITS.

NRC
allowance not in CTS

L.3	Adds ITS Required Action Notes to allow administrative means to be used to verify a locked closed OPERABLE air lock door in high radiation areas or areas with limited access due to inerting.	3.6.1.2 Required Actions A.3 and B.3 Notes	3.7.~~C~~ ~~Actions~~ N/A	4
L.4	CTS 3.7.C Action 1 footnote (b) limits the time an inoperable primary containment air lock door can be used to facilitate the removal of personnel for a cumulative time not to exceed one hour per year. The ITS does not include a cumulative time period per year to limit entry and exit into the primary containment with one inoperable air lock door, however, the use of the air lock will be limited to an explicit time period for any single entry into the Condition as long as administrative controls are imposed. ITS 3.6.1.2 Required Action A Note 2 is added to the Technical Specifications to allow entry through a closed and/or locked OPERABLE air lock door (for reasons other than repairs) for 7 days under administrative controls. The new allowance is proposed to have strict administrative controls, which are detailed in the Bases.	3.6.1.2 Required Action A Note 2	3.7.C Action 1 footnote (b)	4
L.5	Change the Frequency for the air lock interlock test from once per 6 months only upon entry into the primary containment air lock when primary containment is de-inerted, to 24 months.	SR 3.6.1.2.2	4.7.C.2 including footnote (e)	3
L.6	Deletes requirement to have one air lock door "locked" closed at all times.	N/A	3.7.C Action 2	4
3.6.1.3, Primary Containment Isolation Valves				
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for performing the automatic PCIV actuation test, EFCV actuation test, and TIP squib valve initiation test.	SR 3.6.1.3.7, SR 3.6.1.3.8, SR 3.6.1.3.9	4.7.D.2, 4.7.D.4, 4.7.D.5.b	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

L.1	CTS 3.7.D Action 1 requires an inoperable PCIV (except for MSIVs and reactor building-suppression chamber vacuum breakers) to be restored or the affected penetration isolated in 4 hours. The ITS allows 72 hours to isolate the affected penetration when a PCIV is inoperable in a penetration with a closed system (as specifically defined in NUREG-0800) or in a penetration whose system piping communicates with the suppression pool and is expected to remain submerged during the accident (i.e., a closed system as defined in the UFSAR), and only one PCIV.	3.6.1.3 Required Action C.1	3.7.D Action 1	6
L.2	The CTS list some, but not all, of the possible acceptable isolation devices that may be used to satisfy the need to isolate a penetration with an inoperable isolation valve. The ITS provides a complete list of acceptable isolation devices.	3.6.1.3 ACTIONS A, B, and C	3.7.D Action 1.c, 3.6.M Action	4
L.3	In the event two or more valves in a penetration are inoperable, CTS 3.7.D Action 1 and the CTS 3.6.M Action, which require maintaining one isolation valve OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 1 hour prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the primary containment is inoperable.	3.6.1.3 ACTION B	3.7.D Action 1, 3.6.M Action	6
L.4	Adds an allowance for intermittently opening, under administrative control, closed primary containment isolation valves, other than those currently allowed to be opened using CTS 3.7.D and Action 1 footnote (a).	3.6.1.3 ACTIONS Note 1, SR 3.6.1.3.2, SR 3.6.1.3.3	3.7.D and Action 1 footnote (a)	1, 4
L.5	Deletes CTS 4.7.D.1, since explicit post maintenance Surveillance Requirements are not required.	N/A	4.7.D.1	3
L.6	Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance that verifies each PCIV actuates on an automatic isolation "test" signal.	SR 3.6.1.3.7	4.7.D.2	3
L.7	Deletes the requirement that each excess flow check valve must check flow. The ITS requires the EFCVs to actuate to their isolation position (i.e., closed) on an actual or simulated instrument line break signal.	SR 3.6.1.3.8	4.7.D.4	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

L.8	Extends from 4 hours to 72 hours the time to either repair the inoperable excess flow check valve or isolate the associated instrument.	3.6.1.3 Required Action C.1	3.7.D Action 2	6
L.9	The requirements related to verification of the position of primary containment isolation manual valves and blind flanges, are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position.	SR 3.6.1.3.2, SR 3.6.1.3.3	4.7.A.2, including footnote (b)	3
L.10	Adds Note to allow the verification of the isolation devices used to isolate the penetrations in high radiation areas to be verified by use of administrative means, regardless of whether or not the isolation devices are inside the primary containment. In addition, adds a Note to allow verification of isolation devices that are locked, sealed, or otherwise secured to also be performed using administrative means.	3.6.1.3 Note 1 to Required Actions A.2 and C.2, SR 3.6.1.3.2, 3.6.1.3 Note 2 to Required Actions A.2 and C.2	4.7.A.2 footnote (b)	3, 4
3.6.1.4, Drywell Pressure				
NONE	NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature				
NONE	NONE	NONE	NONE	NONE
3.6.1.6, Low Set Relief Valves				

L.1	Deletes the CTS requirement to place the reactor mode switch in shutdown if unable to close the open relief valve or if suppression pool temperature is ≥ 110°F, since Required Action D.1 of ITS 3.6.2.1 will also require that the reactor mode switch be immediately placed in shutdown if the suppression pool average temperature is ≥ 110°F.	N/A	3~~0~~.F Action 1 6	5
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the verification that the opening setpoint of each vacuum breaker is ≤ 0.5 psid.	SR 3.6.1.7.3	4.7.F.2.b.1)	10
L.1	Adds an ACTION to allow two lines to have all vacuum breakers inoperable for opening for up to one hour without requiring a shutdown, as is currently required by CTS 3.0.C. In addition, add ITS ACTIONS Note, "Separate Condition entry is allowed for each line, " to provide proper direction for inoperable vacuum breakers. 3.6.1.7	3.6.1.7 ACTION D, ~~and~~ ACTIONS Note	~~3.0.C~~ N/A ~~NRC~~ 3.0.C Not in LDoc or CTS markup	6
L.2	Deletes the vacuum breaker position indication instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY.	N/A	3.7.F Action 3, 4.7.F.2.a.2), 4.7.F.2.b.2)	1, 3, 4
L.3	Relaxation of the Surveillance Frequency from 7 days to 14 days for verifying the vacuum breakers are closed.	SR 3.6.1.7.1	4.7.F.1	3
L.4	Adds a Note to the Surveillance to allow vacuum breakers to be open during the performance of required Surveillances.	SR 3.6.1.7.1, Note 1	4.7.~~0~~ F.1	3
3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing the verification that the opening setpoint of each vacuum breaker is ≤ 0.5 psid.	SR 3.6.1.8.3	4.7.E.2.c.1)	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

L.1	Deletes the vacuum breaker position indication instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY.	N/A	3.7.E Action 3, 4.7.E.2.b, 4.7.E.2.c.2), 4.7.E.2.c.3)	1, 3, 4
L.2	Relaxation of the Surveillance Frequency from 7 days to 14 days for verifying the vacuum breakers are closed.	SR 3.6.1.8.1	4.7.E.1	3
L.3	Adds a Note stating that the vacuum breakers can be opened when performing required Surveillances. CTS requires that the vacuum breakers be closed at all times; with no allowance for opening during performances of required Surveillances.	SR 3.6.1.8.1 Note 1	4.7.E.1	3
	3.6.2.1, Suppression Pool Average Temperature			
L.1	Removes the details of how to reduce suppression pool temperature to within the limits (by operating at least one low pressure coolant injection loop in the suppression pool cooling mode).	N/A	3.7.K Action 4	4
L.2	When the suppression pool temperature is > 95°F but ≤ 110°F, the CTS requires a 30 minute suppression pool temperature verification and an hourly power level verification. When suppression pool temperature is > 95°F and ≤ 110°F, and power is > 1% RTP, ITS requires verification of suppression pool temperature once per hour in this condition. If < 1% RTP, SR 3.6.2.1.1 verification of temperature every 24 hours is sufficient.	3.6.2.1 Required Action A.1, SR 3.6.2.1.1	4.7.K.2.c, 4.7.K.2.b.2)	3, 6
	3.6.2.2, Suppression Pool Water Level			
L.1	Extends from 1 hour to 2 hours the time to restore level when the suppression pool water level is outside the limits.	3.6.2.2 Required Action A.1	3.7.K Action 1, 3.5.C Action 1	6

3.6.2.3, Suppression Pool Cooling				
L.1	Adds a restoration time (8 hours) when both suppression pool cooling subsystems are inoperable. Currently, no time is provided; CTS 3.7.M Action 2 requires a unit shutdown.	3.6.2.3 ACTION B	3.7.M Action 2	6
3.6.2.4, Suppression Pool Spray				
NONE	NONE	NONE	NONE	NONE
3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure				
L.1	Deletes the drywell-suppression chamber differential pressure instrumentation, since it does not necessarily relate directly to the respective system OPERABILITY.	N/A	3.7.H Actions 2, 3, and 4, 4.7.H.2	1, 3, 4
3.6.3.1, Primary Containment Oxygen Concentration				
NONE	NONE	NONE	NONE	NONE
3.6.4.1, Secondary Containment				
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for performing CTS 4.7.N.3, which ensures that the Secondary Containment is OPERABLE.	SR 3.6.4.1.3	4.7.N.3	10
3.6.4.2, Secondary Containment Isolation Valves				

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each automatic SCIV actuates to the isolation position on an actual or simulated automatic isolation signal.	SR 3.6.4.2.3	4.7.O.2	10
L.1	Adds an allowance for intermittently opening, under administrative control, closed secondary containment isolation valves under, other than those currently allowed to be opened using CTS 4.7.N, footnote (a) (locked or sealed-closed penetrations).	3.6.4.2 ACTIONS Note 1, SR 3.6.4.2.1 Note 2	4.7.N footnote (a)	1
L.2	In the event both dampers in a penetration are inoperable in an open penetration, the CTS 3.7.O Action, which requires maintaining one isolation damper OPERABLE, would not be met and an immediate shutdown would be required. The ITS provides 4 hours prior to commencing a required shutdown, consistent with the existing time allowed for conditions when the secondary containment is inoperable.	3.6.4.2 ACTION B	3.7.O Action	6
L.3	Deletes CTS 4.7.O.1, since explicit post maintenance Surveillance Requirements are not required.	N/A	4.7.O.1	3
L.4	Addition of the phrase "actual or," in reference to the automatic isolation signal for the Surveillance Requirement that verifies each SCIV actuates on an automatic isolation "test" signal.	SR 3.6.4.2.3	4.7.O.2	3
L.5	The requirements related to verification of the position of secondary containment isolation penetrations not capable of being closed by OPERABLE secondary containment isolation valves (SCIVs), are revised in the ITS to exclude verification of manual valves and blind flanges that are locked, sealed, or otherwise secured in the correct position.	3.6.4.2 Required Action A.2 Note 2, SR 3.6.4.2.1	4.7.N.2.b	3, 4
	3.6.4.3, Standby Gas Treatment System			
LD.1	Relaxation of the Surveillance Frequency from 18 months to 24 months for verification that each SGT subsystem actuates on an actual or simulated automatic initiation signal.	SR 3.6.4.3.3	4.7.P.4.b	10

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

L.1	The CTS requires suspending operations if an SGT subsystem cannot be returned to OPERABLE status within 7 days, and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. As an alternative, the ITS will allow the OPERABLE SGT subsystem to be placed in operation and continue to conduct operations (e.g., OPDRVs).	3.6.4.3 Required Action C.1	3.7.P Action 1.b	4
L.2	Addition of the phrase "actual or," in reference to the automatic initiation signal for the Surveillance that verifies each subsystem actuates on an automatic initiation "test" signal.	SR 3.6.4.3.3	4.7.P.4.b	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.7.1, Containment Cooling Service Water System			
L.1	Extends the out of service time for one CCSW subsystem inoperable for reasons other than one inoperable pump from 72 hours to 7 days.	3.7.1 ACTION C	3.8.A Action 1.c	6
	3.7.2, Diesel Generator Cooling Water System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the DGCW automatic start Surveillance.	SR 3.7.2.2	4.8.B.2	10
L.1	Adds the phrase “actual or simulated” in reference to the actual test signal that verifies that each DGCW subsystem pump starts. tion	SR 3.7.2.2	4.8.B.2	3
	3.7.3, Ultimate Heat Sink			
NONE	NONE	NONE	NONE	NONE
	3.7.4, Control Room Emergency Ventilation System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the CREV System isolation and operation Surveillances.	SR 3.7.4.3, SR 3.7.4.4	4.8.D.5.b, 4.8.D.5.c	10
	3.7.5, Control Room Emergency Ventilation Air Conditioning System			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 month for the CREV Air Conditioning System operation Surveillance.	SR 3.7.5.1	4.8.D.1	10

3.7.6, Main Condenser Offgas				
L.1	Extends the time allowed to close the main steam isolation valves from 8 hours to 12 hours. Also deletes the explicit requirement to be in STARTUP since the closure of all main steam line isolation valves will require the mode switch to be placed in the startup/hot standby position to avoid a scram on Main Steam Line Isolation Valve— Closure.	3.7.6 ACTION B	3.8.I Action	5, 6
L.2	Adds new Required Actions that require the plant to be in MODE 3 in 12 hours and MODE 4 in 36 hours, which exits the new Applicability of the LCO.	3.7.6 Required Actions B.3.1 and B.3.2	N/A	5
L.3	CTS 4.8.I.2.b requires the main condenser offgas activity to be determined within 4 hours following the determination of an increase of 50%. The ITS requires the performance of this Surveillance at the same Frequency, however it is modified to allow factoring out increases in activity as a result of a THERMAL POWER increase.	SR 3.7.6.1	4.8.I.2.b	3
L.4	Adds a finite time limit to allow the Surveillance to not be performed until 31 days after any main steam line is not isolated and the SJAE is in operation.	SR 3.7.6.1 Note	4.8.I.2 footnote (b)	3
3.7.7, Main Turbine Bypass System				
NONE	NONE	NONE	NONE	NONE
3.7.8, Spent Fuel Storage Pool Water Level				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.E, Flood Protection				
NONE	NONE	NONE	NONE	NONE

Current Specification 3/4.8.F, Snubbers				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.G, Sealed Source Contamination				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.8.1, AC Sources - Operating			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for the following AC sources related Surveillance Requirements: offsite circuit transfer test; single load reject test; full load reject test; LOOP test; LOCA test; automatic trip bypass test; 24 hour run test; hot restart test; DG synchronization shutdown test; load block interval test; and LOCA/LOOP test.	SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19, SR 3.8.1.14, SR 3.8.1.15, SR 3.8.1.16, SR 3.8.1.17, SR 3.8.1.18	4.9.A.1.b, 4.9.A.8.b, 4.9.A.8.c, 4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, 4.9.A.8.g, 4.9.A.8.h, 4.9.A.8.j, 4.9.A.8.k	10
L.1	In the event of multiple concurrent AC Source inoperabilities, provides a maximum restoration time limit presented as an additional Completion Time of "14 days from discovery of failure to meet LCO 3.8.1.a or b" in ITS 3.8.1 Required Actions A.3 and B.4. In addition, in the event of multiple DG inoperabilities or multiple offsite circuit inoperabilities, a separate time period is allowed in ITS 1.3 for the subsequent repair. It essentially allows extension of the initial restoration time by 24 hours, not to exceed the actual time if the subsequent inoperability were tracked from its time of loss.	3.8.1 Required Actions A.3 and B.4	3.9.A Actions 1.b, 2.c, 3.d, 5.b, 6.d	6
L.2	Deletes the CTS requirement to complete the diesel start test for failures that are potentially generic regardless of when the inoperable diesel is restored to operable status.	N/A	3.9.A Action 2.b footnote (b)	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

L.3	CTS 3.9.A Action 2.b requires a verification within 24 hours and every 72 hours thereafter that the cause of a DG inoperability does not affect the remaining DGs. CTS 3.9.A Action 3.b requires a verification within 8 hours and every 72 hours thereafter, the that the cause of a DG inoperability does not affect the remaining DGs. In both Actions, the initial evaluation or test is not required if a test was performed in the past 24 hours. In addition, when two DGs are inoperable, CTS 3.9.A Action 6.c requires the performance of CTS 4.9.A.2.c (DG slow start) within the subsequent 72 hours after a DG is restored to service. ITS 3.8.1 Required Actions B.3.1 and B.3.2 will continue to require this verification, but will allow 24 hours to perform the verification, and there will be no requirement to re-test the OPERABILITY of the OPERABLE DG.	3.8.1 Required Actions B.3.1 and B.3.2	3.9.A Actions 2.b, 3.b, and 6.c	6
L.4	The explicit requirement to periodically verify that each DG is aligned to provide standby power to the associated emergency buses is considered to be unnecessary for ensuring compliance with the applicable Technical Specification Operability requirements and is removed from the Technical Specifications.	LCO 3.8.1	4.9.A.2.e	3
L.5	CTS 4.9.A.3 requires checking for and removing accumulated water from the DG day tanks every 31 days and "after each operation of the diesel where the period of operation was greater than or equal to 1 hour." ITS SR 3.8.1.5 only requires the check every 31 days; the frequency of "after each operation of the diesel where the period of operation was greater than or equal to 1 hour" has been deleted.	SR 3.8.1.5	4.9.A.3	3
L.6	The Completion Time to verify that required systems, subsystems, trains, components, and devices powered from the redundant DG(s) are OPERABLE has been extended from 2 hours to 4 hours.	3.8.1 Required Action B.2	3.9.A Actions 4.a and 6.b	6
L.7	For the surveillances that automatically start the DG but do not tie it to a bus, the requirements have been changed to only require the minimum voltage and frequency limits to be met within the appropriate time limits. Once steady state conditions are reached, the minimum and maximum voltage and frequency limits must be maintained.	SR 3.8.1.8, SR 3.8.1.13	4.9.A.7, 4.9.A.8.e	3

L.8	The phrase "actual or", in reference to the loss of offsite power signal or the ECCS actuation signal, as applicable, has been added to CTS 4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, and 4.9.A.8.g for verifying the proper response of the DG. This allows satisfactory loss of offsite power or ECCS actuations for other than Surveillance purposes to be used to fulfill the Surveillance Requirement. OPERABILITY is adequately demonstrated in either case since the DG cannot discriminate between "actual" or "simulated" signals.	SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.19, SR 3.8.1.14	4.9.A.8.d, 4.9.A.8.e, 4.9.A.8.f, 4.9.A.8.g	3
L.9	The manner in which the DG is started for CTS 4.9.A.8.h (i.e., that the DG must be within the proper voltage and frequency within a certain time limit after the start signal) has not been included in the ITS.	SR 3.8.1.15	4.9.A.8.h	3
L.10	Deletes explicit post maintenance Surveillance Requirements as required by CTS 4.9.A.9 (i.e., after any modifications which could affect DG interdependence).	N/A	4.9.A.9	3
L.11	CTS 4.9.A.9 requires the DGs to accelerate to 900 rpm in ≤ 13 seconds. For these DGs, 900 rpm is equivalent to a frequency of 60 Hz. The ITS will require the minimum frequency to be 58.8 Hz, as shown in ITS SR 3.8.1.20, since the accident analysis requires the DG to be capable of being loaded within 13 seconds (this can be accomplished at 58.8 Hz).	SR 3.8.1.20	4.9.A.9	3
L.12	The load range requirements of CTS 4.9.A.2.d, CTS 4.9.A.8.c, and CTS 4.9.A.8.h (the 22-hour load requirements only) have been relaxed slightly to provide margin to the DG's continuous rating. The new load range in ITS SRs 3.8.1.3, 3.8.1.11, and 3.8.1.15 is 90% to 100% of the continuous rating (2340 kW to 2600 kW).	SR 3.8.1.3, SR 3.8.1.11, SR 3.8.1.15	4.9.A.2.d, 4.9.A.8.c, 4.9.A.8.h	3
L.13	Deletes CTS 4.9.A.8, footnote (d), which restricts the performance of CTS 4.9.A.8.c, the DG full load rejection test, and CTS 4.9.A.8.h, the DG 24 hour endurance run, to only one DG at a time.	N/A	4.9.A.8 footnote (d)	3
L.14	Deletes CTS 4.9.A.8.k upper load block limit, such that the interval between each load block is only required to be ≥90% of the design load interval.	SR 3.8.1.18	4.9.A.8.k	3
3.8.2, AC Sources - Shutdown				

L.1	In an effort to consistently address the concern of the only required DG and the only required offsite circuit connected (presenting a significant risk of a single fault resulting in a station blackout) and to avoid potential conflicting Technical Specifications, the Surveillances that would require the DG to be connected to the offsite source are excepted from performance requirements. The exception does not take exception to the requirement for the DG to be capable of performing the particular function; just to the requirement to demonstrate it while that source of power is being relied on to support meeting the LCO.	SR 3.8.2.1 Note 1	4.9.B	3
L.2	CTS 4.9.B, which provides the Surveillance Requirements for the AC Sources while in Modes 4 and 5 and during handling of irradiated fuel in the secondary containment, requires the Surveillances of CTS 4.9.A to be performed. Two of the Surveillances of CTS 4.9.A are the DG start on an ECCS initiation signal and the DG start and load on an ECCS initiation signal concurrent with a loss of offsite power signal. Note 2 to SR 3.8.2.1 will exempt these two Surveillances when the associated ECCS subsystem(s) are not required to be Operable. ing	SR 3.8.2.1 Note 2	4.9.B	3
L.3	An alternative is proposed in the ITS to suspend the movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs if being conducted when less than the required AC sources are OPERABLE. The alternative is to declare affected required feature(s) inoperable and continue to conduct operations if the ~~affected~~ required features(s) ACTIONS allow.	3.8.2 Required Action A.1	3.9.B Action 1	4
3.8.3, Diesel Fuel Oil and Starting Air				
L.1	CTS 3.9.A Action 7 provides a 7 day restoration period for the new fuel oil parameters tested by CTS 4.9.A.5 when they are found not within specified limits. In addition, CTS 3.9.B provides no restoration time when the fuel oil parameters are not within the limits of CTS 4.9.A.5 and 4.9.A.6 in MODES 4 and 5 and when handling irradiated fuel in the secondary containment. ITS 3.8.3 ACTION B will allow 30 days to restore new fuel properties to within the specified limits. If not restored, ITS 3.8.3 ACTION D is provided to declare the DG inoperable. In addition, a 7 day time has been provided in ITS 3.8.3 ACTION A to restore stored fuel oil total particulates to within limits when in MODE 4 or 5, or when handling irradiated fuel in the secondary containment.	3.8.3 ACTIONS A, B, and D	3.9.A Actions, 3.9.B Actions	6

L.2	The diesel starting air parameter, while supporting DG OPERABILITY, contain substantial margin in addition to the limit which would be absolutely necessary for DG OPERABILITY. Therefore, a certain level of degradation in this parameter is justified to extend the allowance for restoration (presented as ITS 3.8.3 ACTION C and ACTIONS Note). During the extended restoration period for this parameter, the DG would still be capable of performing its intended function. ACTION C allows 48 hours to restore starting air pressure prior to declaring the DG inoperable, provided a 1 start capacity remains. ACTION D is provided to declare the DG inoperable if the previous ACTION is not met. During the proposed extended period for restoration of this parameter, the DG would still be capable of performing its intended function.	3.8.3 ACTIONS Note, 3.8.3 ACTIONS C and D	3.9.A Actions, 3.9.B Actions	6
	3.8.4, DC Sources - Operating			
LD.1	Relaxation of Surveillance Frequency from 18 months to 24 months for the following Surveillances: Visual inspection of battery for physical damage or abnormal deterioration; verification that cell-to-cell and terminal connections are free of corrosion; inter-cell and terminal connection resistance checks; battery charger test; and battery service test.	SR 3.8.4.4, SR 3.8.4.5, SR 3.8.4.6, SR 3.8.4.7, SR 3.8.4.8	4.9.C.3, 4.9.C.4	10
L.1	Removes from CTS 4.9.C.2 the requirement to verify, within 7 days after a battery discharge or overcharge, that there is no visible corrosion at either terminals or connectors, or that connection resistance is < 150 $X10^{-6}$ohm or 20% above baseline connection resistance. space	N/A	4.9.C.2	3
L.2	CTS 4.9.C.3.b requires the cell-to-cell and terminal connections to be "clean, tight." The confirmation that the connection is "tight" is typically performed by application of a torque, which results in unnecessary stress being applied to the bolted connection. If the connection satisfies the resistance requirements of ITS SR 3.8.4.6, it can be assumed to be sufficiently "tight." The "clean" requirement has been deleted since it is redundant to the "free of corrosion" requirement. In addition, the requirement to verify that connections are "clean" and "tight" is only applicable to nickel cadmium batteries. The DC electrical power subsystem batteries are lead calcium batteries.	SR 3.8.4.6	4.9.C.3.b	3

	3.8.5, DC Sources - Shutdown			
L.1	Three of the DC sources Surveillances required to be performed by CTS 4.9.D (CTS 4.9.C.4, 4.9.C.5, and 4.9.C.6) involve tests that would cause the only required OPERABLE unit 250V battery to be rendered inoperable. This condition presents a significant risk if an event were to occur during the test. In an effort to consistently address this concern, ITS SR 3.8.5.1 has a Note that excludes performance requirements of Surveillances that would require the required OPERABLE 250V DC battery to be rendered inoperable. This allowance does not take exception to the requirement for the battery to be capable of performing the particular function - just to the requirement to demonstrate that capability while that source of power is being relied on to support meeting the LCO.	SR 3.8.5.1 Note	N/A	3
L.2	An alternative is proposed in the ITS to suspending operations if a DC Source is inoperable, and movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs are being conducted. The alternative is to declare affected required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow.	3.8.5 Required Action A.1	3.9.D Action	4
	3.8.6, Battery Cell Parameters			
L.1	Removes the requirement to verify that the average electrolyte temperature of selected battery cells is above 65°F within 7 days after a battery discharge or overcharge.	N/A	4.9.C.2	3
L.2	Changes the CTS 4.9.C.2.c requirement, which requires measurement of the temperature for all connected cells every 92 days, to only require representative cells (10% of the total, as defined in the Bases) be verified within limits every 92 days.	SR 3.8.6.3	4.9.C.2.c	3

L.3	The time specified in CTS 3.9.C Actions 4 and 5 to restore Category A and B battery cell parameters to within limits has been extended from the next 6 days and 7 days, respectively, to 31 days in ITS 3.8.6 Required Action A.3. In addition, periodic verification that the Category C limits are not being exceeded must be performed. ITS 3.8.6 Required Action A.2 requires this verification every 7 days.	3.8.6 Required Actions A.2 and A.3	3.9.C Actions 4 and 5	6
L.4	Adds footnote (a) to the electrolyte level limits for Table 3.8.6-1, Category A and B limits, allowing for a temporary electrolyte level increase during and following an equalize charge.	Table 3.8.6-1 footnote (a)	Table 4.9.C-1	1
L.5	CTS 4.9.D requires the batteries and chargers to be demonstrated OPERABLE per the Surveillance Requirements of CTS 4.9.C. The CTS 4.9.C requirements include battery cell parameter Surveillances. However, the CTS 3.9.D Action does not provide any specific actions for when battery cell parameters are exceeding the limits in CTS 4.9.C. Therefore, the associated DC electrical power sources must be declared inoperable and the Action of CTS 3.9.D must be taken immediately. In lieu of taking the CTS 3.9.D Action immediately, ITS 3.8.6 ACTION A will provide time to restore the Category A and B battery cell parameters prior to declaring the associated DC power source inoperable and taking the Action of CTS 3.9.D (ITS 3.8.5 ACTION A). ITS 3.8.6 ACTION B will require the associated battery to be declared inoperable (thus requiring ACTION A of ITS 3.8.5 to be taken) if ACTION A is not met, if the Category C battery cell parameters are not met, or if the electrolyte temperature is not within the limit. Furthermore, if the requirements of LCO 3.8.6 are not met, the associated battery must be declared inoperable, therefore, LCO 3.8.4 requirements must also be met.	3.8.6 ACTIONS A and B	3.9.D Action	6
3.8.7, Distribution Systems - Operating				

NRC
This statement is not true, only enter LCO 3.8.4 ACTIONS if 3.8.6 ACTION B requires it.

L.1	CTS 3.9.E Action 1 allows 8 hours to restore one inoperable AC subsystem and CTS 3.9.E Action 2 allows 2 hours to restore one inoperable DC subsystem. No time is provided if buses are inoperable in Division 1 and 2 AC subsystems concurrently or in Division 1 and 2 DC subsystems concurrently, requiring entry into CTS 3.0.C. ITS 3.8.7 ACTIONS A and B allow one "or more" AC and DC electrical power distribution subsystems to be concurrently inoperable, without requiring an ITS 3.0.3 entry; either 8 hours or 2 hours (8 hours for AC and 2 hours for DC) will be allowed to restore the inoperabilities. However, ITS 3.8.7 ACTION E is also added to require that if two or more electrical power distribution subsystems are inoperable and, in combination, result in a loss of function, then ITS 3.0.3 must be entered immediately.	3.8.7 ACTIONS A, B, and E	3.9.E Actions 1 and 2	6
	3.8.8, Distribution Systems - Shutdown			
L.1	An alternative is proposed in the ITS to suspend ing the movement of irradiated fuel assemblies, CORE ALTERATIONS, or OPDRVs if being conducted when less than the required AC ~~sources~~ or DC distribution subsystem(s) are OPERABLE. The alternative is to declare affected required feature(s) inoperable and continue to conduct operations if the affected required features(s) ACTIONS allow.	3.8.8 Required Action A.1	3.9.F Action	4

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.9.1, Refueling Equipment Interlocks			
L.1	Deletes the requirement to perform the Surveillance Requirement "within 24 hours prior to the start of" use of the component, since the normal 7 day periodic Surveillance Frequency of CTS 4.10.A.2 (proposed SR 3.9.1.1) for the CHANNEL FUNCTIONAL TEST of the reactor mode switch refuel position interlocks provides adequate assurance of OPERABILITY.	N/A	4.10.A.2	3
L.2	Deletes explicit requirement for the affected reactor mode switch refuel position interlocks to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATION(s) following repair, maintenance, or replacement of any component that could affect the refuel position interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.10.A.3	3
L.3	Adds actions to allow a control rod block to be inserted and to verify all control rods are fully inserted in lieu of suspending in-vessel fuel movement when a required Refuel position equipment interlock is inoperable.	3.9.1 Required Actions A.2.1 and A.2.2	N/A	4
	3.9.2, Refuel Position One-Rod-Out Interlock			
L.1	Deletes the requirement to "lock" the mode switch in Shutdown.	N/A	3.10.A, 3.10.A Action 1, 4.10.A.1	8
L.2	Revises actions, with the one-rod-out interlock inoperable, to immediately suspend control rod withdrawal and initiate action to insert all insertable control rods in core cells containing one or more fuel assemblies. CTS requires CORE ALTERATIONS to be suspended and the reactor mode switch to be locked in Shutdown or Refuel.	3.9.2 Required Actions A.1 and A.2	3.10.A Actions 1 and 2	5

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the requirement to perform CTS 4.10.A.1.b "within 2 hours prior" and CTS 4.10.A.2 "within 24 hours prior to the start of" use of the component, since the normal 12 hour periodic Surveillance Frequency to verify the reactor mode switch is locked in the refuel position and the normal 7 day periodic Surveillance Frequency for the CHANNEL FUNCTIONAL TEST of the one-rod-out interlock provide adequate assurance of OPERABILITY.	N/A	4.10.A.1.b, 4.10.A.2	3
L.4	Provides an allowance to enter the LCOs Applicability for a short time (1 hour) to provide adequate time to perform the required Surveillance.	SR 3.9.2.2 Note	N/A	7
L.5	Deletes explicit requirement for the one-rod-out interlock to be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST before resuming control rod withdrawal or CORE ALTERATIONS following repair, maintenance, or replacement of any component that could affect the one-rod-out interlock, since SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.10.A.3	3
	3.9.3, Control Rod Position			
L.1	Revises the Applicability that all control rods be fully inserted in Operational MODE 5 during CORE ALTERATIONS to "when loading fuel assemblies into the core," since the intent is to establish the requirement that all control rods are inserted only in those situations that could add positive reactivity but are not covered by other Technical Specifications. In addition, the Actions have been revised consistent with the change in Applicability.	3.9.3, 3.9.3 ACTION A	3.10.C, 3.10.C Action	2, 4
L.2	Deletes the requirement to perform CTS 4.10.C.2 "within 2 hours prior to the start of" Core Alterations since the normal 12 hour periodic Surveillance Frequency to verify the control rods are inserted provides adequate assurance of OPERABILITY.	N/A	4.10.C.2	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.9.4, Control Rod Position Indication			
L.1	Omits the position indication requirement in that no position indication is proposed to be required other than the full-in position indication. The OPERABILITY of the control rod "full-in" position indication for each control rod (whether the control rod is inserted or withdrawn) is proposed to be required to support OPERABILITY of the refueling interlocks and OPERABILITY of the one-rod-out interlock. In addition, the Surveillance Requirements have also been modified to be consistent with this concept (the full-in indicator only must be OPERABLE). The new Surveillance requires that each time a control rod is withdrawn from the full-in position, the full-in indication is indicating correctly (i.e., it is not indicating full-in when a control rod is withdrawn). The current requirements to verify the position of the control rod every 24 hours, that the control rod position changes during exercise tests, that the full-out indicator functions during rod coupling checks, and the full-in position indication checks prior to each reactor startup and each time a control rod is fully inserted, have been deleted.	LCO 3.9.4, SR 3.9.4.1	3.3.I, 3.3.I Action 3, 4.3.I.1, 4.3.I.2	1, 3
	3.9.5, Control Rod OPERABILITY - Refueling			
NONE	NONE	NONE	NONE	NONE
	3.9.6, RPV Water Level - Irradiated Fuel			
L.1	Deletes the requirement to perform CTS 4.10.G "within 2 hours prior to the start of" handling fuel assemblies, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY.	N/A	4.10.G	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
3.9.7, RPV Water Level - New Fuel or Control Rods				
L.1	Splits current Specification 3.10.G, which provides reactor vessel water level requirements during handling of fuel assemblies and control rods within the reactor pressure vessel (RPV), into two Specifications. ITS 3.9.7 now provides the requirements for movement of new fuel assemblies and control rods within the RPV when irradiated fuel assemblies are seated within the RPV, with water level determined from the top of irradiated fuel assemblies seated within the RPV rather than from the top of the RPV flange as is in CTS 3.10.G.	LCO 3.9.7	3.10.G	1
L.2	Deletes the requirement to perform CTS 4.10.G "within 2 hours prior to the start of" handling fuel assemblies or control rods, since the normal 24 hour periodic Surveillance Frequency for verification of reactor vessel water level provides adequate assurance of OPERABILITY.	N/A	4.10.G	3
3.9.8, Shutdown Cooling (SDC) - High Water Level				
NONE	NONE	NONE	NONE	NONE
3.9.9, Shutdown Cooling (SDC) - Low Water Level				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.10.E, Communications				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	3.10.1, Reactor Mode Switch Interlock Testing			
L.1	ITS allows reactor mode switch interlock testing to be conducted in MODES 3, 4, and 5 if control rods are not fully inserted, provided these non-fully inserted control rods are in cells containing no fuel assemblies, in lieu of current requirement that all control rods remain fully inserted.	3.10.1	Table 1-2 footnote (a), 4.10.A.2 and 4.10.A.3 footnote (d)	1
	3.10.2, Single Control Rod Withdrawal - Hot Shutdown			
L.1	Deletes the requirement to "lock" the reactor mode switch in Refuel.	N/A	3.10.A, 4.10.A.1	8
	3.10.3, Single Control Rod Withdrawal - Cold Shutdown			
L.1	Deletes the requirement to "lock" the reactor mode switch in Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	3.10.I.1, 4.10.I.1, 3.10.A, 3.10.A.1	1, 8
L.2	For removal of a control rod drive in Cold Shutdown, alternative requirements have been provided in ITS 3.10.3 in place of the SHUTDOWN MARGIN and control rod five-by-five array of disarming requirements. The alternatives require all MODE 5 RPS Functions to be OPERABLE, MODE 5 requirements for LCO 3.3.8.2, RPS Electric Power Monitoring, and LCO 3.9.5, Control Rod OPERABILITY — Refueling, to be made applicable. In addition, an alternative requirement has been provided in place of the one-rod-out interlock requirement. The alternative will require a control rod withdrawal block to be inserted. New Surveillances have also been added to perform the applicable SRs for the required LCOs if RPS Functions, and control rod OPERABILITY requirements are chosen, and to verify every 24 hours that a control rod withdrawal block is inserted if the block is the chosen requirement.	LCO 3.10.3.b.2, LCO 3.10.3.c.1, SR 3.10.3.1, SR 3.10.3.4	N/A	1

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the requirement to perform CTS 4.10.I "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.10.I	3
3.10.4, Single Control Rod Drive Removal - Refueling				
L.1	Deletes the requirement to "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	3.10.I.1, 4.10.I.1	1, 8
L.2	Deletes the requirement to perform CTS 4.10.I "Within 4 hours prior to the start of removal of a control rod and/or the associated control rod drive mechanism from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.10.I	3
3.10.5, Multiple Control Rod Withdrawal - Refueling				
L.1	The requirement "lock" the reactor mode switch in Shutdown or Refuel and the explicit requirement for the reactor mode switch to be OPERABLE.	N/A	3.10.J.1, 4.10.J.1.a	1, 8
L.2	Deletes the requirement to perform CTS 4.10.J "Within 4 hours prior to the start of removal of control rods and/or control rod drive mechanisms from the core and/or reactor pressure vessel," since the normal 24 hour periodic Surveillance Frequency to verify the requirements of the LCO are met provides adequate assurance that the LCO requirements are satisfied.	N/A	4.10.J.1	3

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
L.3	Deletes the explicit requirement for the performance of a functional test of the "one-rod-out Refuel position interlock" following replacement of all control rods and/or control rod drive mechanisms removed in accordance with CTS 3.10.J, if the function had been bypassed, since after restoration of a component that caused a required SR to be failed, SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components.	N/A	4.10.J.2	3
	3.10.6, Control Rod Testing - Operating			
L.1	Adds Special Operations Technical Specification to allow LCO 3.1.6, "Rod Pattern Control," to be suspended to allow performance of SDM testing, control rod scram time testing, and control rod friction testing, provided the analyzed rod position sequence requirements of SR 3.3.2.1.8 are changed to require the control rod sequence to conform to the specified test sequence; or the RWM is bypassed, the requirements of LCO 3.3.2.1, Function 2 are suspended, and conformance to the approved control rod sequence for the specified test is verified by a second licensed operator or other qualified member of the technical staff. These two requirements for the Special Operation effectively limit the potential amount and rate of reactivity increase that could occur during a control rod drop accident (CRDA).	3.10.6	N/A	1
	3.10.7, SDM Test - Refueling			
L.1	Modifies the Surveillance Frequency to require the RWM verification to be performed in accordance with the applicable Surveillance requirements of the RWM Specification, and the CORE ALTERATION verification every 12 hours, instead of once within 30 minutes prior to the start of the SDM test.	SR 3.10.7.2, SR 3.10.7.4	4.12.B	3

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 3/4.12.A, Primary Containment Integrity				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation				
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION	CHANGE TYPE
	5.1, Responsibility			
NONE	NONE	NONE	NONE	NONE
	5.2, Organization			
L.1	Deletes the requirement for an SRO to be present in the control room while the unit is in MODE 4.	N/A	6.2.B.2	1
	5.3, Unit Staff Qualifications			
NONE	NONE	NONE	NONE	NONE
	5.4, Procedures			
NONE	NONE	NONE	NONE	NONE
	5.5, Programs and Manuals			
LD.1	Relaxation of Surveillance Frequency from 18 to 24 months for the requirement establishing a program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels.	5.5.2.b	6.8.D.1.b	10

LD.2	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that the SGT System inplace charcoal adsorbers, HEPA filters, and heaters perform their safety function.	5.5.7	4.7.P.2.a, 4.7.P.2.b, 4.7.P.2.c, 4.7.P.4.a, 4.7.P.4.c	10
LD.3	Relaxation of Surveillance Frequency from 18 to 24 months for the requirements ensuring that in-place Control Room Emergency Ventilation System charcoal adsorbers, HEPA filters, and heaters are capable of performing their safety function.	5.5.7	4.8.D.3.a, 4.8.D.3.b, 4.8.D.3.c, 4.8.D.5.a, 4.8.D.5.d	10
L.1 new	Revises the requirements to allow 1) new fuel oil to meet either the ASTM standard for API gravity or absolute specific gravity; 2) the performance of a clear and bright appearance test with proper color or a water and sediment test; 3) "water and sediment" analyses of the stored fuel to be performed within 31 days after the addition of any new fuel oil to the storage tanks; and 4) excluding, for bulk stored fuel oil, the 31 day requirement to (if the color requirements are met) verify "water and sediment" and "kinematic viscosity" and providing a limit for particulate contaminants of ≤ 10 mg/liter.	5.5.9.a.1, 5.5.9.a.3, 5.5.9.b, 5.5.9.c,	4.9.A.5.b, 4.9.A.6.b	3
	5.6, Reporting Requirements			
L.1	Revises the requirement for submitting the Annual Radiological Environmental Operating Report and Radioactive Effluent Release Report from prior to May 1 and April 1 of each year, respectively, to by May 15 and prior to May 1 of each year, respectively.	5.6.2, 5.6.3	6.9.A.3, 6.9.A.4	6
	5.7, High Radiation Area			
NONE	NONE	NONE	NONE	NONE
	Current Specification 6.4, Training			

TABLE L - LESS RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

NONE	NONE	NONE	NONE	NONE
Current Specification 6.7, Safety Limit Violation				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.11, Radiation Protection Program				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.13, Process Control Program				
NONE	NONE	NONE	NONE	NONE

CHANGE TYPE

1. Relaxation of the LCO Requirement
2. Relaxation of Applicability
3. Relaxation of Surveillance Requirement
4. Relaxation of Required Action Detail
5. Relaxation of Required Actions to Exit Applicability
6. Relaxation of Completion Time
7. Allow Mode Changes When LCO Not Met
8. Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
9. Elimination of CTS Reporting Requirement
10. Relaxation of Surveillance Frequency from 18 months to 24 months

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
1.0-LA.1	1.0	Moves the definition of FRACTION OF RATED POWER (FRTP) and TRANSIENT LINEAR HEAT GENERATION RATE (TLHGR) to ITS 3.2.4 Bases.	Bases	Bases Control Process in ITS Chapter 5.0	1
1.0-LA.2	1.0	Moves the definition of STEADY STATE LINEAR HEAT GENERATION RATE (SLHGR) to ITS 3.2.3 Bases.	Bases	Bases Control Process in ITS Chapter 5.0	1
1.0-LA.3	1.0	Moves items a, b, c, and f from the PRIMARY CONTAINMENT INTEGRITY definition to the ITS 3.6.1.1 Bases and items b and e from the CTS SECONDARY CONTAINMENT INTEGRITY definition to the ITS 3.6.4.1 Bases.	Bases	Bases Control Process in ITS Chapter 5.0	1

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 2.0 - SAFETY LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.0 - LCO AND SR APPLICABILITY

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.1.1, SHUTDOWN MARGIN			
3.1.1-LA.1	4.3.A.1, 4.3.A.3	The details of the methods to determine SHUTDOWN MARGIN (SDM).	Bases	Bases Control Program in ITS Chapter 5	3
		3.1.2, Reactivity Anomalies			
3.1.2-LA.1	3.3.B Action	The requirement to perform an analysis to determine and explain the cause of the reactivity difference.	Bases	Bases Control Program in ITS Chapter 5	3
		3.1.3, Control Rod OPERABILITY			
3.1.3-LA.1	3.3.C Actions 1.a.2), 2.b, and 2.c, 3.3.H Action 1.b, 3.3.I Action 1.c	The details of the recommended procedures for disarming control rod drives.	Bases	Bases Control Program in ITS Chapter 5	3
3.1.3-LA.2	3.3.I Actions 1.a and 1.b	Details of methods for determining the position of a control rod.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.1.4, Control Rod Scram Times			
3.1.4-LA.1	4.3.D.3	ITS SR 3.1.4.2 will test a "representative sample" of control rods each 120 days of power operation instead of the CTS requirement of "10% of the control rods on a rotating basis". The details of what constitutes a representative sample are relocated.	Bases	Bases Control Program in ITS Chapter 5	3
		3.1.5, Control Rod Scram Accumulators			
NONE	NONE	NONE	NONE	NONE	NONE
		3.1.6, Rod Pattern Control			
NONE	NONE	NONE	NONE	NONE	NONE
		3.1.7, Standby Liquid Control System			
3.1.7-LA.1	4.4.A.2.b	The details of the method for performing the Surveillance to determine boron concentration is within limits (by a chemical analysis).	Bases	Bases Control Program in ITS Chapter 5	3
3.1.7-LA.2	4.4.A.4.a	The details of the method for performing the Surveillance to verify flow through the SLC subsystem into the reactor pressure vessel (initiating an explosive valve).	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.1.8, SDV Vent and Drain Valves					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.3.J, Control Rod Drive Housing Support					
~~None L.1~~ NONE	~~3/4.3.J~~ NONE	~~Requirement for Control Rod Drive Housing Support to be in place.~~ NONE	NONE	NONE	NONE
Current Specification 3/4.3.N, Economic Generation Control System					
NONE	NONE	NONE	NONE	NONE	NONE

NRC This is in Table L, not being relocated, i.e., this is a duplicate entry.

TABLE LA- REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
3.2.1-LA.1	3.11.A Action 1	The requirement in the CTS 3.11.A Action 1 to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3
		3.2.2, MINIMUM CRITICAL POWER RATIO			
3.2.2-LA.1	3.11.C Action 1	The requirement in the CTS 3.11.C Action 1 to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3
		3.2.3, LINEAR HEAT GENERATION RATE			
3.2.3-LA.1	3.11.D Action 1	The requirement in the CTS 3.11.D Action 1 to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3
		3.2.4, APRM GAIN AND SETPOINT			

TABLE LA- REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.2.4-LA.1	3.11.B Action	The requirement in the CTS 3.11.B Action to "initiate corrective action within 15 minutes" to restore the limit is relocated in the form of a discussion that "prompt action" should be taken to restore the parameter to within the limits.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.3.1.1, RPS Instrumentation			
3.3.1.1-LA.1	3.1.A Action footnotes a and b	The details relating to placing channels in trip (e.g, if tripping causes trip function to occur, tripping trip system with the most inoperable channels).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.1.1-LA.2	Table 3.1.A-1 footnote (e)	The LPRM inputs for OPERABILITY of the APRM (2 per level; 50% of the LPRM inputs to each required APRM).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.1.1-LA.3	4.1.A-1 footnote (b)	Details of the methods for performing CTS 4.1.A.1, the IRM and APRM CHANNEL CHECK (½ decade overlap).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.1.1-LA.4	Table 2.2.A-1 footnote (a)	The detail of system description for the APRM Flow-Biased Neutron Flux—High scram Allowable Value (the definition of W, the recirculation loop drive flow).	Bases	Bases Control Program in ITS Chapter 5	1
3.3.1.1-LA.5	Table 2.2.A-1 footnote (b)	The details in concerning the Allowable Value of the Reactor Vessel Water Level—Low Function (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1
		3.3.1.2, SRM Instrumentation			
3.3.1.2-LA.1	4.2.G.1	The detail of the method for performing the Surveillance ("with the detector fully inserted").	Bases	Bases Control Program in ITS Chapter 5	3

3.3.1.2-LA.2	3.10.B, 3.10.B.1, 4.10.B.1	The details relating to SRM OPERABILITY; i.e., that the SRMs shall be inserted to the normal operating level with continuous indication in the control room.	Bases	Bases Control Program in ITS Chapter 5	1, 2
3.3.1.2-LA.3	3.10.B Applicability	The additional spatial limitations when movable detectors are being used.	Bases	Bases Control Program in ITS Chapter 5	3
		3.3.2.1, Control Rod Block Instrumentation			
3.3.2.1-LA.1	Table 3.2.E-1 footnote (a)	The statement that the RBM shall be automatically bypassed when a peripheral control rod is selected.	~~Bases~~ UFSAR	~~Bases Control Program in ITS Chapter 5~~ 10 CFR 50.59	1
3.3.2.1-LA.2	Table 4.2.E-1 Functional Unit 1, footnote (c), 4.3.L.2.a, 4.3.L.2.b	Details in of the methods for performing Surveillances (i.e., the RBM CFT includes the reactor manual control "relay select matrix" system input and the RWM CFT includes verifying correct indication of the selection error of at least one out-of-sequence control rod and verifying the rod block function).	Bases	Bases Control Program in ITS Chapter 5	3
		3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation			
3.3.2.2-LA.1	Table 3.2.J-1 footnote (a)	The detail concerning the Allowable Value for the Reactor Vessel Water Level — High Function (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1

3.3.3.1, Post Accident Monitoring Instrumentation					
3.3.3.1-LA.1	Table 3.2.F-1 Action 61	The use of alternate methods of monitoring (initiate the preplanned alternate method of monitoring the parameters).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.3.1-LA.2	Table 4.2.F-1 footnote (a)	The detail of the method for performing the CHANNEL CALIBRATION of the Drywell Radiation Monitors.	Bases	Bases Control Program in ITS Chapter 5	3
3.3.3.1-LA.3	Table 3.2.F-1 (including footnote (a)) and 4.2.F-1 Instrumentation 13	The Torus Pressure Function because it is shared with drywell pressure functions which are retained in ITS.	Bases	Bases Control Program in ITS Chapter 5	1
3.3.4.1, ATWS-RPT Instrumentation					
3.3.4.1-LA.1	3.2.C Action 2 footnote (a)	The details relating to placing channels in trip (e.g, if tripping causes trip function to occur).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.4.1-LA.2	Table 3.2.C-1 footnote (c)	The detail concerning the Allowable Value for the Reactor Vessel Water Level — Low Low Function (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1
3.3.5.1, ECCS Instrumentation					

3.3.5.1-LA.1	Table 3.2.B-1 footnote (h), Table 3.2.B-1 Functiona l Unit 3.d	The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero) and the detail that the Allowable Value for the HPCI Suppression Chamber Water Level - High Function is referenced above the bottom of the chamber.	UFSAR	10 CFR 50.59	1
3.3.5.1-LA.2	Table 3.2.B-1 footnote (i)	The detail relating to system design (e.g., valves associated with isolation signals).	Bases	Bases Control Program in ITS Chapter 5	1
3.3.5.2, IC System Instrumentation					
NONE	NONE	NONE	NONE	NONE	NONE
3.3.6.1, Primary Containment Isolation Instrumentation					
3.3.6.1-LA.1	3.2.A Action 2 footnote (a)	The details relating to placing channels in trip (e.g, if tripping causes trip function to occur).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.6.1-LA.2	Table 3.2.A-1 footnote (i)	The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION

3.3.6.1-LA.3	Table 3.2.A-1 footnote (f)	The detail in CTS that the Standby Liquid Control System Initiation Function channel closes only reactor water cleanup system isolation valves	Bases	Bases Control Program in ITS Chapter 5	1
		3.3.6.2, Secondary Containment Isolation Instrumentation			
3.3.6.2-LA.1	3.2.A Action 2 footnote (a)	The details relating to placing channels in trip (e.g, if tripping causes trip function to occur).	Bases	Bases Control Program in ITS Chapter 5	3
3.3.6.2-LA.2	Table 3.2.A-1 footnote (i)	The detail concerning the Allowable Values for the Reactor Vessel Water Level Functions (i.e., the Allowable Value is referenced to a level above the top of active fuel, and that the top of active fuel is defined to be 360 inches above vessel zero).	UFSAR	10 CFR 50.59	1
3.3.6.2-LA.3	Tables 3.2.A-1 and 4.2.A-1 footnote (c)	Details relating to system design (i.e., specific valves and systems affected).	Bases	Bases Control Program in ITS Chapter 5	1
3.3.6.2-LA.4	4.7.P.4.b. 2)	The details in CTS 4.7.P.4.b.2 relating to methods for performing the LOGIC SYSTEM FUNCTIONAL TEST (use of simulated signals).	Bases	Bases Control Program in ITS Chapter 5	3
		3.3.6.3, Relief Valve Instrumentation			
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.3 - INSTRUMENTATION

3.3.7.1, CREV System Instrumentation					
NONE	NONE	NONE	NONE	NONE	NONE
3.3.8.1, Loss of Power Instrumentation					
3.3.8.1-LA.1	Table 3.2.B-1 Functiona l Unit 6.a	The detail relating to the methods (on decreasing voltage) for determining the 4160 V ESS Bus Undervoltage (Loss of Voltage) Allowable Value.	Bases	Bases Control Program in ITS Chapter 5	1
3.3.8.2, RPS Electric Power Monitoring					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.2.H, Explosive Gas Monitoring					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.4.1, Recirculation Loops Operating			
3.4.1-LA.1	3.6.A Action 1.b	The details of the actual MCPR correction factor for the MCPR operating limit for single loop operation ("0.01").	COLR	COLR change control process described in Chapter 5 of the ITS	3
3.4.1-LA.2	4.6.A	The details relating to the recirculation pump MG set scoop tube stop settings.	TRM	10 CFR 50.59	1
3.4.1-LA.3	3.6.A Action 2	The requirement to "immediately initiate measures to place the unit in at least STARTUP" when no recirculation loops are in operation is relocated in the form of a discussion that "action must be taken as soon as practicable" to be in MODE 2.	Bases	Bases Control Program in ITS Chapter 5	3
		3.4.2, Jet Pumps			
NONE	NONE	NONE	NONE	NONE	NONE
		3.4.3, Safety and Relief Valves			
3.4.3-LA.1	3.6.E footnote (a)	The details relating to lift setting pressure of the safety valves (the lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures).	Bases	Bases Control Program in ITS Chapter 5	1
3.4.3-LA.2	3.6.F footnote (a)	The details indicating that one of the relief valves is a "Target Rock" combination safety /relief valve.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.4 - REACTOR COOLANT SYSTEM

3.4.3-LA.3	4.6.E.2	The requirements for safety valve setting verification demonstrating the Reactor Coolant System (RCS) safety valves are OPERABLE.	IST Program	IST Program in ITS Chapter 5	3
3.4.4, RCS Operational Leakage					
3.4.4-LA.1	4.6.H.2	Details of the method for performing the reactor coolant system leakage Surveillance (by determining the primary containment sump flow rate).	Bases	Bases Control Program in ITS Chapter 5	3
3.4.5, RCS Leakage Detection Instrumentation					
3.4.5-LA.1	4.6.G.2	The detail of what Drywell Floor Drain Sump Monitoring System instrumentation (pump discharge flow integrator) is subject to a CHANNEL CALIBRATION.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.6, RCS Specific Activity					
NONE	NONE	NONE	NONE	NONE	NONE
3.4.7, Shutdown Cooling System - Hot Shutdown					
3.4.7-LA.1	3.6.O.1, 3.6.O.2	The details of what constitutes an OPERABLE SDC subsystem (i.e., each subsystem consists of an OPERABLE pump and heat exchanger).	Bases	Bases Control Program in ITS Chapter 5	1
3.4.7-LA.2	4.6.O	The detail of the method of verifying operation of the SDC subsystem (circulating reactor coolant).	Bases	Bases Control Program in ITS Chapter 5	3

3.4.8, Shutdown Cooling System - Cold Shutdown					
3.4.8-LA.1	3.6.P.1, 3.6.P.2	The details of what constitutes an OPERABLE SDC subsystem (i.e., each subsystem consists of an OPERABLE pump and heat exchanger).	Bases	Bases Control Program in ITS Chapter 5	1
3.4.8-LA.2	4.6.P	The detail of the method of verifying operation of the SDC subsystem (circulating reactor coolant).	Bases	Bases Control Program in ITS Chapter 5	3
3.4.9, RCS Pressure and Temperature (P/T) Limits					
3.4.9-LA.1	3.6.K Action 2	The detail to perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the reactor coolant system.	Bases	Bases Control Program in ITS Chapter 5	3
3.4.9-LA.2	3.6.D Action, 4.6.D	The details relating to operational limits (loop flow) during a return to two recirculation pump operation from single recirculation loop operation.	UFSAR	10 CFR 50.59	1
3.4.10, Reactor Steam Dome Pressure					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.6.N, Structural Integrity					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.5 - ECCS AND IC SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.5.1, ECCS-Operating			
3.5.1-LA.1	3.5.A	The details relating to ECCS subsystem OPERABILITY (i.e., number of pumps and flow paths capable of taking suction from the suppression chamber and transferring water to the reactor vessel).	Bases	Bases Control Program in ITS Chapter 5	1
3.5.1-LA.2	4.5.A.1.a. 2) footnote (a)	The details relating to what "correct position" means for an automatic valve.	Bases	Bases Control Program in ITS Chapter 5	3
3.5.1-LA.3	4.5.A.1.b, 4.5.A.3.b. 1), 4.5.A.3.b. 2), 4.5.A.4.b	The details relating to methods for performing Surveillances (i.e., the minimum pressure to perform the low pressure HPCI flow test, verifying the HPCI System pump flow controller is in the correct position, verifying the HPCI suction is automatically transferred from the contaminated condensate storage tank to the suppression pool on the proper signals, and verifying proper operation of the ADS valves).	Bases	Bases Control Program in ITS Chapter 5	2, 3
		3.5.2, ECCS-Shutdown			
3.5.2-LA.1	3/4.5.B, 3.5.C.2	The details of CTS 3/4.5.B relating to system OPERABILITY (in this case what constitutes an OPERABLE ECCS subsystem) and CTS 3.5.C.2 (reference for suppression chamber level).	Bases	Bases Control Program in ITS Chapter 5	1
		3.5.3, IC System			
NONE	NONE	NONE	NONE	NONE	NONE

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.6.1.1, Primary Containment					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.2, Primary Containment Air Lock					
3.6.1.2-LA.1	3.7.C Action 2	The purpose as to why an individual is dedicated to ensure the necessary administrative controls during entry and exit of personnel through an air lock with an inoperable air lock interlock mechanism are followed (i.e., "to assure that both air lock doors are not opened simultaneously").	Bases	Bases Control Program in ITS Chapter 5	3
3.6.1.3, Primary Containment Isolation Valves					
3.6.1.3-LA.1	4.7.D.3	The requirement to stroke time test the power operated, non-automatic, PCIVs.	IST Program	10 CFR 50.59 and 10 CFR 50.55a	3
3.6.1.3-LA.2	4.7.D.5.b	Requirements in CTS 4.7.D.5.b concerning the replacement charges for the traversing in-core probe (TIP) explosive valves (i.e., replacement charge shall be from the same batch or from another batch that has had one charge fired, and no charge shall remain in use past its shelf-life and operating-life).	Bases	Bases Control Program in ITS Chapter 5	3
3.6.1.3-LA.3	4.7.D.6	The details that the main steam isolation valve leakage is on a maximum pathway leakage basis and is tested "in accordance with the methods" of the Primary Containment Leakage Rate Testing Program.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS

3.6.1.4, Drywell Pressure					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.6, Low Set Relief Valves					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers					
3.6.1.7-LA.1	3.7.F	The detail comprising what "OPERABLE" means (i.e, closed).	Bases	Bases Control Program in ITS Chapter 5	1
3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers					
3.6.1.8-LA.1	4.7.E.2.c.1)	The detail that the opening setpoint is verified from the closed position.	Bases	Bases Control Program in ITS Chapter 5	3
3.6.2.1, Suppression Pool Average Temperature					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.6 - CONTAINMENT SYSTEMS

3.6.2.2, Suppression Pool Water Level					
3.6.2.2-LA.1	3.5.C.1	The detail that the suppression pool level limit is referenced from the bottom of the suppression chamber .	Bases	Bases Control Program in ITS Chapter 5	1
3.6.2.3, Suppression Pool Cooling					
3.6.2.3-LA.1	3.7.M	The details relating to system OPERABILITY (in this case the suppression pool cooling function is designated as two "independent" subsystems, each with a pump and flow path).	Bases	Bases Control Program in ITS Chapter 5	1
3.6.2.4, Suppression Pool Spray					
3.6.2.4-LA.1	3.7.L	The details relating to system OPERABILITY (in this case the suppression pool spray function is designated as two "independent" subsystems, each with a pump and flow path).	Bases	Bases Control Program in ITS Chapter 5	1
3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure					
3.6.2.5-LA.1	3.7.H footnote (a)	The detail that defines the types of required Surveillances ("which reduces the differential pressure") where the drywell-to-suppression chamber differential pressure can be outside of limits for 4 hours.	Bases	Bases Control Program in ITS Chapter 5	3
3.6.3.1, Primary Containment Oxygen Concentration					
NONE	NONE	NONE	NONE	NONE	NONE

3.6.4.1, Secondary Containment					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.4.2, Secondary Containment Isolation Valves					
NONE	NONE	NONE	NONE	NONE	NONE
3.6.4.3, Standby Gas Treatment System					
3.6.4.3-LA.1	3.7.P	The detail relating to system design (i.e., that the SGT subsystems are "independent")	Bases	Bases Control Program in ITS Chapter 5	1
3.6.4.3-LA.2	4.7.P.1, 4.7.P.4.b.1	Details of the methods for performing the standby gas treatment subsystem 31 day operating Surveillance (by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers) and the current manual actuation test requirement (verifying "Manual initiation from the control room").	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.7.1, Containment Cooling Service Water System			
3.7.1-LA.1 separately to the associated	3.8.A	The details relating to system OPERABILITY (that the CCSW subsystems shall be independent and that each subsystem shall have two CCSW pumps capable of taking suction from the ultimate heat sink and transferring the water to the associated LPCI heat exchanger and safety related equipment).	Bases	Bases Control Program in ITS Chapter 5	1
3.7.1-LA.2	3/4.8.A	LCO requirements, Actions, and Surveillance Requirements for the CCSW System when in MODES 4 and 5 and when handling irradiated fuel in the secondary containment, CORE ALTERATIONS, and OPDRVs.	TRM	10 CFR 50.59	3
		3.7.2, Diesel Generator Cooling Water System			
3.7.2-LA.1	3.8.B	The details relating to system OPERABILITY (that each DGCW subsystem shall have one OPERABLE DGCW pump, and an OPERABLE flow path capable of taking suction from the ultimate heat sink and transferring water to the associated diesel generator).	Bases	Bases Control Program in ITS Chapter 5	1
3.7.2-LA.2	3/4.8.B	LCO requirements, Actions, and Surveillance Requirements for the DGCW System when in MODES or conditions other than MODE 1, 2, or 3. Due to this change, the Applicability has been modified to be "MODES 1, 2, and 3," consistent with the DG Applicability requirements in ITS 3.8.1.	TRM	10 CFR 50.59	3
3.7.2-LA.3	4.8.B.2	The detail concerning the specific start signal (start signal for the associated DG) to be used during the surveillance.	Bases	Bases Control Program in ITS Chapter 5	3

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS

		3.7.3, Ultimate Heat Sink			
3.7.3-LA.1	3.8.C	LCO requirements, Actions, and Surveillance Requirements for the Ultimate Heat Sink when in MODES or conditions other than MODE 1, 2, or 3.	TRM	10 CFR 50.59	3
		3.7.4, Control Room Emergency Ventilation System			
3.7.4-LA.1	3.8.D	The details of what constitutes the Control Room Emergency Ventilation System (i.e, an Operable control room emergency filtration system).	Bases	Bases Control Program in ITS Chapter 5	1
3.7.4-LA.2	4.8.D.2, 4.8.D.5.b	Details of the methods for performing the CREV System 31 day operating Surveillance and system actuation test (by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and by verifying the filter train starts and isolation dampers close on manual initiation from the control room).	Bases	Bases Control Program in ITS Chapter 5	3
		3.7.5, Control Room Emergency Ventilation Air Conditioning System			
3.7.5-LA.1	3.8.D	The details of what constitutes the Control Room Emergency Ventilation Air Conditioning System (i.e, an Operable refrigeration control unit).	Bases	Bases Control Program in ITS Chapter 5	1
		3.7.6, Main Condenser Offgas			
3.7.6-LA.1	4.8.I.1	The requirement to continuously monitor radioactivity rate of noble gases from the main condenser air ejector.	ODCM	ODCM Control Process in ITS Chapter 5	3

3.7.6-LA.2	4.8.I.2	Details defining the method for performing this Surveillance (i.e., performing an isotopic analysis of a representative sample of gases taken at the recombiner outlet, or the air ejector outlet, if the recombiner is bypassed).	Bases	Bases Control Program in ITS Chapter 5	3
3.7.7, Main Turbine Bypass System					
NONE	NONE	NONE	NONE	NONE	NONE
3.7.8, Spent Fuel Storage Pool Water Level					
3.7.8-LA.1	3.10.H Action	The requirement to suspend crane operations with loads in the spent fuel storage pool area when the spent fuel storage pool water level is not within the limit.	UFSAR	10 CFR 50.59	3
3.7.8-LA.2	3.10.H Action	Details of the methods for suspending movement of fuel assemblies (after placing the fuel assemblies in a safe condition).	Bases	Bases Control Program in ITS Chapter 5	3
Current Specification 3/4.8.E, Flood Protection					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.F, Snubbers					
None-LA.1	3/4.8.F	Snubber inspection and testing requirements.	TRM	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.7 - PLANT SYSTEMS

Current Specification 3/4.8.G, Sealed Source Contamination					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.8.1, AC Sources - Operating			
3.8.1-LA.1	LCO 3.9.A.1, LCO 3.9.A.2, LCO 3.9.A.2.c	The details relating to system design and OPERABILITY (i.e., that the offsite circuits are "physically independent," the DGs are "separate and independent," and that each DG has "a separate fuel transfer pump").	Bases	Bases Control Program in ITS Chapter 5	1
3.8.1-LA.2	4.9.A.8.b	The specific kilowatt value of the single largest post-accident load for the single load rejection Surveillance Requirement (increased to the proper value).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.1-LA.3	N/A	Not used.	N/A	N/A	N/A
3.8.1-LA.4	4.9.A.8.i	The specific load value for the auto-connected loads.	UFSAR	10 CFR 50.59	1
		3.8.2, AC Sources - Shutdown			
3.8.2-LA.1	LCO 3.9.B.2.c	The detail relating to system design and OPERABILITY (i.e., that each DG has a fuel oil transfer pump).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.2-LA.2	3.9.B Action 1.d	Requirements to suspend crane operations over the spent fuel storage pool if fuel assemblies are stored therein when an AC Source is inoperable	UFSAR	10 CFR 50.59	3
		3.8.3, Diesel Fuel Oil and Starting Air			
3.8.3-LA.1	4.9.A.10	The 10 year requirement to drain, remove sediment and and clean each fuel tank.	TRM	10 CFR 50.59	3

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

		3.8.4, DC Sources - Operating			
3.8.4-LA.1	LCO 3.9.C.1, LCO 3.9.C.2	Details relating to system OPERABILITY (what constitutes a DC Source division).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.4-LA.2	4.9.C footnote (a)	The detail that an alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE.	Bases	Bases Control Program in ITS Chapter 5	3
3.8.4-LA.3	4.9.C.4	The details of the method (actual or simulated) to perform the battery service test.	Bases	Bases Control Program in ITS Chapter 5	3
3.8.4-LA.4	4.9.C.6	Specific limits on battery degradation and guidance regarding the intent of the term "degradation."	Bases	Bases Control Program in ITS Chapter 5	3
		3.8.5, DC Sources - Shutdown			
3.8.5-LA.1	LCO 3.9.D.1, LCO 3.9.D.2	Details relating to system OPERABILITY (what constitutes a required DC electrical power source).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.5-LA.2	4.9.D footnote (a)	The detail that an alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE is relocated in the form of a discussion that states the alternate 125 VDC battery can be used to meet the requirements of the LCO.	Bases	Bases Control Program in ITS Chapter 5	3

3.8.6, Battery Cell Parameters					
3.8.6-LA.1	4.9.C footnote (a)	The detail that an alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE is relocated in the form of a discussion that states the alternate 125 VDC battery can be used to meet the requirements of the LCO.	Bases	Bases Control Program in ITS Chapter 5	3
3.8.7, Distribution Systems - Operating					
3.8.7-LA.1	LCO 3.9.E, LCO 3.9.E.1, LCO 3.9.E.2, LCO 3.9.E.3, LCO 3.9.E.4, 3.9.E Actions 1 and 2	The details relating to system design (the list of buses) and OPERABILITY (the buses are required to be energized).	Bases	Bases Control Program in ITS Chapter 5	1
3.8.8, Distribution Systems - Shutdown					

3.8.8-LA.1	LCO 3.9.F, LCO 3.9.F.1, LCO 3.9.F.2, LCO 3.9.F.3, 3.9.F Action	The details relating to system design (the list of buses) and OPERABILITY (the buses are required to be energized).	Bases	Bases Control Program in ITS Chapter 5	1

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		3.9.1, Refueling Equipment Interlocks			
NONE	NONE	NONE	NONE	NONE	NONE
		3.9.2, Refuel Position One-Rod-Out Interlock			
NONE	NONE	NONE	NONE	NONE	NONE
		3.9.3, Control Rod Position			
NONE	NONE	NONE	NONE	NONE	NONE
		3.9.4, Control Rod Position Indication			
NONE	NONE	NONE	NONE	NONE	NONE
		3.9.5, Control Rod OPERABILITY - Refueling			
NONE	NONE	NONE	NONE	NONE	NONE
		3.9.6, RPV Water Level - Irradiated Fuel			
3.9.6-LA.1	3.10.G Action	Details of the methods for suspending movement of fuel assemblies (after placing the fuel assemblies in a safe condition).	Bases	Bases Control Program in ITS Chapter 5	3
		3.9.7, RPV Water Level - New Fuel or Control Rods			

space

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.9.7-LA.1	3.10.G Action	Details of the methods for suspending movement of fuel assemblies and control rods (after placing the fuel assemblies and control rods in a safe condition).	Bases	Bases Control Program in ITS Chapter 5	3
3.9.8, Shutdown Cooling (SDC) - High Water Level					
3.9.8-LA.1	3.10.K.1, 3.10.K.2	The details of what constitutes an OPERABLE RHR shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE RHR pump and heat exchanger).	Bases	Bases Control Program in ITS Chapter 5	3
3.9.8-LA.2	4.10.K	The detail of the method of verifying operation of the shutdown cooling subsystem (circulating reactor coolant).	Bases	Bases Control Program in ITS Chapter 5	3
3.9.9, Shutdown Cooling (SDC) - Low Water Level					
3.9.9-LA.1	3.10.L.1, 3.10.L.2	The details of what constitutes an OPERABLE RHR shutdown cooling subsystem (i.e., each subsystem consists of one OPERABLE RHR pump and heat exchanger).	Bases	Bases Control Program in ITS Chapter 5	3
3.9.9-LA.2	4.10.L	The detail of the method of verifying operation of the shutdown cooling subsystem (circulating reactor coolant).	Bases	Bases Control Program in ITS Chapter 5	3
Current Specification 3/4.10.E, Communications					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.10.1, Reactor Mode Switch Interlock Testing					
3.10.1-LA.1	Table 1-2 footnote (a), 4.10.A.2, 4.10.A.3	The method used to verify control rods remain fully inserted (by verification using a second licensed operator or other technically qualified member of the unit technical staff).	Bases	Bases Control Program in ITS Chapter 5	3
3.10.2, Single Control Rod Withdrawal - Hot Shutdown					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.3, Single Control Rod Withdrawal - Cold Shutdown					
3.10.3-LA.1	3.10.I.4.a, 4.10.I.4.a	The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically).	Bases	Bases Control Program in ITS Chapter 5	3
3.10.4, Single Control Rod Drive Removal - Refueling					
3.10.4-LA.1	3.10.I.4.a, 4.10.I.4.a	The details of the recommended procedures for disarming control rods (i.e., electrically or hydraulically).	Bases	Bases Control Program in ITS Chapter 5	3
3.10.5, Multiple Control Rod Withdrawal - Refueling					
NONE	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
3.10.6, Control Rod Testing - Operating					
NONE	NONE	NONE	NONE	NONE	NONE
3.10.7, SDM Test - Refueling					
NONE	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.12.A, Primary Containment Integrity					
~~None~~ A.1	NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation					
~~None~~ M.1	NONE	NONE	NONE	NONE	NONE

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 4.0 - DESIGN FEATURES

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
4.0-LA.1	5.1.A	The description of the site location.	UFSAR	10 CFR 50.59	1
4.0-LA.2	5.2.A, 5.2.B, 5.2.C	Primary containment configuration and design details, primary containment design temperatures and pressures, and secondary containment design details.	UFSAR	10 CFR 50.59	1
4.0-LA.3	5.3.B	The nominal active control rod assembly absorber length.	UFSAR	10 CFR 50.59	1

TABLE LA - REMOVAL OF DETAILS MATRIX AND SPECIFICATION REQUIREMENTS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
		5.1, Responsibility			
5.1-LA.1	6.1.A	Replaces the specific title "Station Manager" with the generic title "station manager" and relocates the specific title.	QA Manual	10 CFR 50.54	3
5.1-LA.2	6.1.B	The requirement that delineates the responsibility of the Shift Manager for directing and commanding the overall operations of the facility on ~~the~~ his shift.	UFSAR	10 CFR 50.59	3
		5.2, Organization			
5.2-LA.1	6.2.A.2, 6.2.A.3, 6.2.B.6, 6.2.C	Replaces the specific title "Chief Nuclear Officer" with the generic term "a corporate officer." Replaces the specific title "Station Manager" with the generic title "station manager." Replaces the specific titles "Operations Manager" and "Shift Operations Supervisor" with the generic ~~titles~~ "operations manager" and "shift operations supervisor." Replaces the specific title, "Unit Supervisor" with "Shift Manager." The specific titles are relocated. In addition, the person to whom the STA provides advisory ~~technical~~ support will be changed to the shift manager instead of the unit supervisor. This portion is considered administrative.	QA Manual	10 CFR 50.54	3
5.2-LA.2	6.2.B.5	The details with respect to the development and implementation of procedures to limit the working hours of facility staff who perform safety-related functions.	UFSAR	10 CFR 50.59	3
5.2-LA.3	6.2.B.2	The details concerning the location of operators and senior operator.	UFSAR	10 CFR 50.59	3

		5.3, Unit Staff Qualifications			
5.3-LA.1	6.3	Replaces the specific titles "Radiation Protection Manager" with the generic titles "radiation protection manager." The specific titles are relocated.	QA Manual	10 CFR 50.54	3
		5.4, Procedures			
5.4-LA.1	6.8.A.5	The requirement that written procedures for the PROCESS CONTROL PROGRAM (PCP) be established, implemented, and maintained.	UFSAR	10 CFR 50.59	3
		5.5, Programs and Manuals			
5.5-LA.1	6.8.D.2	The details contained in CTS 6.8.D.2, "In-Plant Radiation Monitoring."	UFSAR	10 CFR 50.59	3
5.5-LA.2	4.0.E	Details of the Inservice Inspection (ISI) Program are relocated; and since the Inservice Testing Program is the only requirement remaining, the reference to ASME Code Class 1, 2, and 3 "components" has been changed to "pumps and valves" for clarity.	ISI Program	10 CFR 50.55a	3
5.5-LA.3	4.0.E	Details of the Inservice Testing Program.	IST Program	10 CFR 50.55a	3
5.5-LA.4	4.7.P.2.b, 4.7.P.3, 4.8.D.3.b, 4.8.D.4	The details for implementing the Standby Gas Treatment (SGT) System and the Control Room Emergency Ventilation (CREV) System ventilation filter testing requirements.	TRM	10 CFR 50.59	3
5.5-LA.5	3.8.H, 3.8.J	The details for implementing the liquid holdup tank and explosive gas mixture requirements.	TRM	10 CFR 50.59	3

5.5-LA.6	6.14.A.2	Replaces the specific title "Station Manager" with the generic title "station manager." The specific title is relocated.	QA Manual	10 CFR 50.54	3
5.5-LA.7	6.8.D.1	Details of the Reactor Coolant Sources Outside Primary Containment Program.	UFSAR	10 CFR 50.59	3
		5.6, Reporting Requirements			
5.6-LA.1	6.9.A.6.a.(4)	The details associated with the MCPR Specification (i.e.,scram insertion times, rated and of f rated flow conditions).	Bases	Bases Control Program in ITS Chapter 5	1
5.6-LA.2	6.9.A.6.b	The details of the actual topical reports document date, revision number, volume, supplement , and company.	COLR	COLR change control process in ITS Chapter 5	1
		5.7, High Radiation Area			
NONE	NONE	NONE	NONE	NONE	NONE
		Current Specification 6.4, Training			
None-LA.1	6.4	The details on training and replacement training of station personnel.	UFSAR	10 CFR 50.59	3
		Current Specification 6.7, Safety Limit Violation			
None-LA.1	6.7.A.1	The requirement for notification of the Site Vice President or designated alternate.	QA Manual	10 CFR 50.54	3

Current Specification 6.11, Radiation Protection Program					
None-LA.1	6.11	The details on Radiation Protection Program procedures.	UFSAR	10 CFR 50.59	3
Current Specification 6.13, Process Control Program					
None-LA.1	6.13	The details contained in the Process Control Program Specification and the definition of PROCESS CONTROL PROGRAM.	UFSAR	10 CFR 50.59	3

CHANGE TYPE

1. Details of system design and system description including design limits
2. Description of system operation
3. Procedural details for meeting TS requirement, relocated reporting requirements and relocated specification requirements.

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 1.0 - USE AND APPLICATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 2.0 - SAFETY LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.0 - LCO AND SR APPLICABILITY

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
		3.1.1, SHUTDOWN MARGIN		
NONE	NONE	NONE	NONE	NONE
		3.1.2, Reactivity Anomalies		
NONE	NONE	NONE	NONE	NONE
		3.1.3, Control Rod OPERABILITY		
NONE	NONE	NONE	NONE	NONE
		3.1.4, Control Rod Scram Times		
NONE	NONE	NONE	NONE	NONE
		3.1.5, Control Rod Scram Accumulators		
NONE	NONE	NONE	NONE	NONE
		3.1.6, Rod Pattern Control		
NONE	NONE	NONE	NONE	NONE
		3.1.7, Standby Liquid Control System		

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE
3.1.8, SDV Vent and Drain Valves				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.3.J, Control Rod Drive Housing Support				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.3.N, Economic Generation Control System				
None-R.1	3/4.3.N	The Economic Generation Control System requirements.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.2 - POWER DISTRIBUTION LIMITS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE				
NONE	NONE	NONE	NONE	NONE
3.2.2, MINIMUM CRITICAL POWER RATIO				
NONE	NONE	NONE	NONE	NONE
3.2.3, LINEAR HEAT GENERATION RATE				
NONE	NONE	NONE	NONE	NONE
3.2.4, APRM GAIN AND SETPOINT				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
		3.3.1.1, RPS Instrumentation		
NONE	NONE	NONE	NONE	NONE
		3.3.1.2, SRM Instrumentation		
NONE	NONE	NONE	NONE	NONE
		3.3.2.1, Control Rod Block Instrumentation		
3.3.2.1-R.1	Tables 3.2.E-1 and 4.2.E-1 Functional Units 2, 3, 4, and 5	The APRM, SRM, IRM, and Scram Discharge Volume control rod blocks.	TRM	10 CFR 50.59
		3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation		
NONE	NONE	NONE	NONE	NONE
		3.3.3.1, Post Accident Monitoring Instrumentation		

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

3.3.3.1-R.1	Tables 3.2.F-1 and 4.2.F-1 Instrumentation 7, 10, and 11	Drywell Air Temperature, Safety Relief Valve Position Indicators, and Source Range Neutron Monitors.	TRM	10 CFR 50.59
3.3.4.1, ATWS-RPT Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.5.1, ECCS Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.5.2, IC System Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.6.1, Primary Containment Isolation Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.6.2, Secondary Containment Isolation Instrumentation				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.3 - INSTRUMENTATION

3.3.6.3, Relief Valve Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.7.1, CREV System Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.8.1, Loss of Power Instrumentation				
NONE	NONE	NONE	NONE	NONE
3.3.8.2, RPS Electric Power Monitoring				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.2.H, Explosive Gas Monitoring				
None-R.1	3/4.2.H	Explosive Gas Monitoring Instrumentation requirements.	TRM	10 CFR 50.59
Current Specification 3/4.2.I, Suppression Chamber and Drywell Spray Actuation				
None-R.1	3/4.2.I	Suppression Chamber and Drywell Spray Actuation ~~pressure~~ Instrumentation requirements.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.4.1, Recirculation Loops Operating				
NONE	NONE	NONE	NONE	NONE
3.4.2, Jet Pumps				
NONE	NONE	NONE	NONE	NONE
3.4.3, Safety and Relief Valves				
NONE	NONE	NONE	NONE	NONE
3.4.4, RCS Operational Leakage				
NONE	NONE	NONE	NONE	NONE
3.4.5, RCS Leakage Detection Instrumentation				
~~None R.1~~ NONE	~~3/4.6.G~~ NONE	~~The requirements for the primary containment atmosphere particulate radioactivity sampling system.~~ NONE	~~TRM~~ NONE	~~10 CFR 50.59~~ NONE
3.4.6, RCS Specific Activity				
NONE	NONE	NONE	NONE	NONE
3.4.7, Shutdown Cooling System - Hot Shutdown				

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM

NONE	NONE	NONE	NONE	NONE
3.4.8, Shutdown Cooling System - Cold Shutdown				
NONE	NONE	NONE	NONE	NONE
3.4.9, RCS Pressure and Temperature (P/T) Limits				
NONE	NONE	NONE	NONE	NONE
3.4.10, Reactor Steam Dome Pressure				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.6.N, Structural Integrity				
None-R.1	3/4.6.N	Structural integrity requirements for the ASME Code Class 1, 2, and 3 components.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.5 - ECCS AND IC SYSTEM

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.5.1, ECCS-Operating				
NONE	NONE	NONE	NONE	NONE
3.5.2, ECCS-Shutdown				
NONE	NONE	NONE	NONE	NONE
3.5.3, IC System				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.6.1.1, Primary Containment				
NONE	NONE	NONE	NONE	NONE
3.6.1.2, Primary Containment Air Lock				
NONE	NONE	NONE	NONE	NONE
3.6.1.3, Primary Containment Isolation Valves				
NONE	NONE	NONE	NONE	NONE
3.6.1.4, Drywell Pressure				
NONE	NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature				
NONE	NONE	NONE	NONE	NONE
3.6.1.6, Low Set Relief Valves				
NONE	NONE	NONE	NONE	NONE
3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers				

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS

NONE	NONE	NONE	NONE	NONE
3.6.1.8, Suppression Chamber-to-Drywell Vacuum Breakers				
NONE	NONE	NONE	NONE	NONE
3.6.2.1, Suppression Pool Average Temperature				
NONE	NONE	NONE	NONE	NONE
3.6.2.2, Suppression Pool Water Level				
NONE	NONE	NONE	NONE	NONE
3.6.2.3, Suppression Pool Cooling				
NONE	NONE	NONE	NONE	NONE
3.6.2.4, Suppression Pool Spray				
3.6.2.4-R.1	3/4.7.L	The Drywell Spray requirements.	TRM	10 CFR 50.59
3.6.2.5, Drywell-to-Suppression Chamber Differential Pressure				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.6 - CONTAINMENT SYSTEMS

3.6.3.1, Primary Containment Oxygen Concentration				
NONE	NONE	NONE	NONE	NONE
3.6.4.1, Secondary Containment				
NONE	NONE	NONE	NONE	NONE
3.6.4.2, Secondary Containment Isolation Valves				
NONE	NONE	NONE	NONE	NONE
3.6.4.3, Standby Gas Treatment System				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.7.1, Containment Cooling Service Water System				
NONE	NONE	NONE	NONE	NONE
3.7.2, Diesel Generator Cooling Water System				
NONE	NONE	NONE	NONE	NONE
3.7.3, Ultimate Heat Sink				
NONE	NONE	NONE	NONE	NONE
3.7.4, Control Room Emergency Ventilation System				
NONE	NONE	NONE	NONE	NONE
3.7.5, Control Room Emergency Ventilation Air Conditioning System				
NONE	NONE	NONE	NONE	NONE
3.7.6, Main Condenser Offgas				
NONE	NONE	NONE	NONE	NONE
3.7.7, Main Turbine Bypass System				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.7 - PLANT SYSTEMS

3.7.8, Spent Fuel Storage Pool Water Level				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.E, Flood Protection				
None-R.1	3/4.8.E	Flood Protection requirements.	TRM	10 CFR 50.59
Current Specification 3/4.8.F, Snubbers				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.8.G, Sealed Source Contamination				
None-R.1	3/4.8.G	Sealed Source Contamination requirements.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.8.1, AC Sources - Operating				
NONE	NONE	NONE	NONE	NONE
3.8.2, AC Sources - Shutdown				
NONE	NONE	NONE	NONE	NONE
3.8.3, Diesel Fuel Oil and Starting Air				
NONE	NONE	NONE	NONE	NONE
3.8.4, DC Sources - Operating				
NONE	NONE	NONE	NONE	NONE
3.8.5, DC Sources - Shutdown				
NONE	NONE	NONE	NONE	NONE
3.8.6, Battery Cell Parameters				
NONE	NONE	NONE	NONE	NONE
3.8.7, Distribution Systems - Operating				

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

NONE	NONE	NONE	NONE	NONE
3.8.8, Distribution Systems - Shutdown				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.9.1, Refueling Equipment Interlocks				
NONE	NONE	NONE	NONE	NONE
3.9.2, Refuel Position One-Rod-Out Interlock				
NONE	NONE	NONE	NONE	NONE
3.9.3, Control Rod Position				
NONE	NONE	NONE	NONE	NONE
3.9.4, Control Rod Position Indication				
NONE	NONE	NONE	NONE	NONE
3.9.5, Control Rod OPERABILITY - Refueling				
NONE	NONE	NONE	NONE	NONE
3.9.6, RPV Water Level - Irradiated Fuel				
NONE	NONE	NONE	NONE	NONE
3.9.7, RPV Water Level - New Fuel or Control Rods				

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE
3.9.8, Shutdown Cooling (SDC) - High Water Level				
NONE	NONE	NONE	NONE	NONE
3.9.9, Shutdown Cooling (SDC) - Low Water Level				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.10.E, Communications				
None-R.1	3/4.10.E	Communications requirements between the control room and refueling platform personnel.	TRM	10 CFR 50.59

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
3.10.1, Reactor Mode Switch Interlock Testing				
NONE	NONE	NONE	NONE	NONE
3.10.2, Single Control Rod Withdrawal - Hot Shutdown				
NONE	NONE	NONE	NONE	NONE
3.10.3, Single Control Rod Withdrawal - Cold Shutdown				
NONE	NONE	NONE	NONE	NONE
3.10.4, Single Control Rod Drive Removal - Refueling				
NONE	NONE	NONE	NONE	NONE
3.10.5, Multiple Control Rod Withdrawal - Refueling				
NONE	NONE	NONE	NONE	NONE
3.10.6, Control Rod Testing - Operating				
NONE	NONE	NONE	NONE	NONE
3.10.7, SDM Test - Refueling				

TABLE R - RELOCATED SPECIFICATIONS
SECTION 3.10 - SPECIAL OPERATIONS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.12.A, Primary Containment Integrity				
NONE	NONE	NONE	NONE	NONE
Current Specification 3/4.12.C, Inservice Leak and Hydrostatic Testing Operation				
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 4.0 - DESIGN FEATURES

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
NONE	NONE	NONE	NONE	NONE

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

ITS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS
5.1, Responsibility				
NONE	NONE	NONE	NONE	NONE
5.2, Organization				
NONE	NONE	NONE	NONE	NONE
5.3, Unit Staff Qualifications				
NONE	NONE	NONE	NONE	NONE
5.4, Procedures				
NONE	NONE	NONE	NONE	NONE
5.5, Programs and Manuals				
NONE	NONE	NONE	NONE	NONE
5.6, Reporting Requirements				
NONE	NONE	NONE	NONE	NONE
5.7, High Radiation Area				

TABLE R - RELOCATED SPECIFICATIONS
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

NONE	NONE	NONE	NONE	NONE
Current Specification 6.4, Training				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.7, Safety Limit Violation				
~~None-LA 1~~	~~6.7.A.1~~ NONE	~~The requirement for notification of the Site Vice President or designated alternate.~~ NONE	~~QA Manual~~ NONE	~~10 CFR 50.54~~ NONE
NONE	NONE	NONE	NONE	NONE
Current Specification 6.11, Radiation Protection Program				
NONE	NONE	NONE	NONE	NONE
Current Specification 6.13, Process Control Program				
NONE	NONE	NONE	NONE	NONE

NRC
Located in Table LA not an R

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

1975 25 years 2000

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. ____ TO FACILITY OPERATING LICENSE NO. NPF-11

AND AMENDMENT NO. ____ TO FACILITY OPERATING LICENSE NO. NPF-18

EXELON GENERATION COMPANY, LLC

LASALLE COUNTY STATION, UNITS 1 AND 2

DOCKET NOS. 50-373 AND 50-374

I. INTRODUCTION

LaSalle County Station, Units 1 and 2 (LaSalle), has been operating with Technical Specifications (TS), issued with the original operating licenses on April 17, 1982, for Unit 1 and December 16, 1983, for Unit 2, as amended from time to time.

By letter dated March 3, 2000, Exelon Generation Company, LLC (EGC, or the licensee, formerly Commonwealth Edison Company), proposed to amend the operating licenses for LaSalle to completely revise the TS with new TS based on the following:

— NUREG-1433, "Standard Tech Spec (Specifications - General Electric
Plants BWR/4" Revision 1, of April 1995
— NUREG-1434, "Standard Technical Specifications - General Electric Plants, BWR/6" Revision 1, of April 1995.
— "NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), published on July 22, 1993 (58 FR 39132).
— The current LaSalle TS, Unit 1 and Unit 2

NRC
LaSalle also used NUREG-1433 for some Specs, need to identify here.

The overall objective of EGC's request, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline TS consistent with 10 CFR 50.36.

Hereinafter, the proposed TS are referred to as the NUREG-1433 and Improved TS (ITS), the existing LaSalle TS are referred to as the Current TS (CTS), and the TS in NUREG-1434 are referred to as the Standard TS (STS). The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively.

EGC retained portions of the CTS in the ITS in addition to basing the ITS on the STS and the Final Policy Statement. The NRC discussed plant-specific issues, including design features, requirements, and operating practices with EGC during a series of conference calls and meetings. In addition, EGC proposed generic changes that were not in the STS. The NRC staff asked EGC to submit such generic issues as proposed changes to the STS through the Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for the LaSalle ITS before evaluating them generically. EGC proposed transferring some CTS requirements to EGC-controlled documents as this was consistent with the Final Policy Statement. In addition, EGC used human factors principles to clarify CTS

ENCLOSURE 2

requirements being retained in the ITS and to define more clearly the appropriate scope of the ITS. Further, EGC proposed changes to the CTS Bases to make each ITS requirement clearer and easier to understand.

Since the licensee prepared the March 3, 2000, application, a number of amendments to the LaSalle operating license were approved, as follows:

Amendment No. (Unit 1, Unit 2)		Description of Change	Issue Date
--	123	Exigent TS Change for Unit 2 Weld Examination	03/22/2000
139	124	UFSAR Change for High Energy Line Break	4/11/2000
140	125	Power Uprate - 5%	5/09/2000
--	126	Increase Minimum Critical Power Ratio Limit	5/17/2000
141	127	Revise TS Requirements on Communications During Control Rod Movement	10/05/2000
142	128	Delete TS Requirements on Reactor Protection System Shorting Links	10/10/2000
143	129	Permit Functional Testing of Diesel Generators during Power Operation	10/16/2000
144	130	Revise Pressure/Temperature Limits	11/08/2000
145	131	Revise License Condition on Fuel Movement	11/09/2000
146	132	Transfer of Operating License to EGC	1/12/2001

These amendments have been incorporated, as appropriate, into the ITS.

The March 3, 2000, application was supplemented by letters dated March 24, June 5, July 18, July 31, September 1, September 22, October 5, October 9, November 20, November 30, December 18, **date (revision D)**, and **date (license conditions)**. The NRC staff issued requests for additional information (RAIs) by letters dated June 21, July 3, August 18, August 31, September 12, and November 3, 2000.

The NRC published its proposed actions on EGC's application for amendment of March 3, 2000, in the *Federal Register* on **date (citation)** and **date (citation)**. This Safety Evaluation (SE) assesses EGC's application and supplemental information that resulted from NRC requests for information and discussions with EGC during the NRC staff's review. All ITS changes are within the scope of the actions described in the *Federal Register* notices.

The NRC staff relied on the Final Policy Statement and the STS as guidance for reviewing proposed deviations from the STS. This SE provides the basis for the NRC staff's conclusions that 1) EGC developed the ITS based on the STS as modified by plant-specific changes, and 2) using the LaSalle ITS is acceptable for continued plant operation. It is acceptable that the ITS

differs from STS, since the ITS reflects LaSalle's current licensing basis. The NRC staff approves EGC's changes to their CTS with modifications documented in their revised submittals.

For the reasons stated in this SE, the NRC staff finds that the TS issued with this license amendment comply with Section 182a of the Atomic Energy Act, 10 CFR 50.36, and the guidance in the Final Policy Statement and that the TS are in accord with the common defense and security and provide adequate protection of the health and safety of the public.

II. BACKGROUND

Section 182a of the Atomic Energy Act requires that applicants for nuclear power plant operating licenses will state:

> [S]uch technical specifications, including information of the amount, kind, and source of special nuclear material required, the place of the use, the specific characteristics of the facility, and such other information as the Commission may, by rule or regulation, deem necessary in order to enable it to find that the utilization . . . of special nuclear material will be in accord with the common defense and security and will provide adequate protection to the health and safety of the public. Such technical specifications shall be a part of any license issued.

In 10 CFR 50.36, the Commission established its regulatory requirements for TS content. In doing so, the Commission emphasized those matters related to preventing accidents and mitigating accident consequences. The Commission noted that applicants were expected to incorporate into their TS "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity" (see Statement of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports," of December 17, 1968 (33 FR 18610)).

10 CFR 50.36 requires that TS include items in the following five specific categories:

(1) safety limits, limiting safety system settings and limiting control settings
(2) limiting conditions for operation (LCOs)
(3) surveillance requirements (SRs)
(4) design features
(5) administrative controls

However, the rule does not specify particular TS requirements.

For several years, NRC and industry representatives have tried to develop guidelines for improving nuclear power plant TS content and quality. On February 6, 1987, the Commission issued their "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, the utility Owners Groups and the NRC staff developed improved STS for each primary reactor type that would comply with the Commission's policy. In addition, the NRC staff, licensees, and Owners Groups developed a Writers Guide containing generic administrative and editorial guidelines for

preparing TS. The Guide emphasized human factors principles, and EGC used it to develop their ITS.

BWR/4 and BWR/6 NUREG-1433 and

were In September 1992, the Commission issued the General Electric STS as NUREG-1434, which was developed using the guidance and criteria contained in the Commission's Interim Policy respectively Statement. The General Electric STS are a model for developing ITS for General Electric plants. The results from applying the Interim Policy Statement criteria to generic system functions were published in a "Split Report" issued to the Nuclear Steam System Supplier (NSSS) Owners Groups in May 1988. The Interim Policy Statement criteria along with the Writer's Guide ensured that the ITS would consistently reflect system configurations and operating characteristics for all NSSS designs. In addition, the generic Bases provide a lot of information about the basis for the STS requirements.

On July 22, 1993, the Commission issued its Final Policy Statement indicating that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36 (58 FR 39132). The Final Policy Statement described the STS safety benefits and encouraged licensees to use the STS as the basis for plant-specific TS amendments and for complete conversions to the IST. Further, the Final Policy Statement gave guidance for evaluating the required scope of the ITS and defined the guidance criteria for determining which of the LCOs and associated surveillances should remain in the ITS. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the ITS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in Portland General Electric Company's hearing (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed the following:

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

Using this approach, licensees should keep in the ITS existing LCO requirements that fall within or satisfy any of the Final Policy Statement criteria. Those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36593, July 19, 1995). The Final Policy Statement criteria are as follows:

Criterion 1 — Installed instrumentation that is used to detect and indicate in the control room a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2 — A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to fission product barrier integrity.

Criterion 3 — A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to fission product barrier integrity.

Criterion 4 — A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Part III of this SE explains the NRC staff's conclusion that converting LaSalle's CTS to those based on STS as modified by plant-specific changes is consistent with LaSalle's current licensing basis and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

III. EVALUATION

The NRC staff's review evaluates changes to CTS that fall into categories, defined by EGC, and includes an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements removed from the CTS and placed in EGC-controlled documents.

The NRC staff's review of the March 3, 2000, submittal, as supplemented, identified the need for clarifications and additions to the submittal in order to establish an appropriate regulatory basis for translation of CTS requirements into ITS. Each change to the CTS proposed in the amendment request is identified as a discussion of change (DOC) to the CTS. EGC also provided justifications for deviation from the STS, as appropriate. The NRC staff comments were documented as requests for additional information (RAIs) and forwarded to EGC. EGC provided written responses to the NRC staff requests in supplemental letters indicated above. The docketed letters clarified and revised EGC's basis for translating CTS requirements into ITS. The NRC staff finds that EGC's submittals provide sufficient detail to allow the staff to reach a conclusion regarding the adequacy of EGC's proposed changes.

EGC's license amendment application categorized CTS changes as follows:

— Administrative Changes, (A), i.e., non-technical changes in existing CTS requirements.

— Technical Changes - More Restrictive, (M), i.e., new or additional CTS requirements.

— Technical Changes - Less Restrictive (specific), (L), i.e., deleting or relaxing CTS requirements.

— Technical Changes - Less Restrictive Relocated Requirements (generic), (LA), i.e., relocation of details out of the CTS and into licensee-controlled documents.

— Technical Changes - Less Restrictive (generic), (LB), i.e., extending an instrument completion time or surveillance frequency according to approved vendor topical reports.

relocation of

— Technical Changes - Less Restrictive, (LC), i.e., eliminating instrumentation requirements for alarm and indication only functions out of the CTS and into the licensee-controlled documents.

— Technical Changes - Less Restrictive, (LD), i.e., extending CTS surveillance intervals to 24 months from 18 months for items other than Channel Calibrations.

— Technical Changes - Less Restrictive, (LE), i.e., extending CTS surveillance intervals to 24 months from 18 months for Channel Calibrations.

— Technical Changes - Less Restrictive, (LF), i.e., use of revised methodologies for determining Allowable Values and instrument setpoints, and analyzing channel/instrument performance to ensure that the design basis and associated safety limits will not be exceeded during plant operation.

— Relocated Specifications, (R), i.e., relaxations in which whole specifications are removed from the CTS and placed in EGC-controlled documents. due to the Specification not meeting the criteria of 10 CFR 50.36

The changes that are in the ITS conversion for LaSalle are listed in the following tables attached to this SE:

- Table A of Administrative Changes to the CTS
- Table M of More-Restrictive Changes to the CTS LB,
- Table L of Less-Restrictive Changes to the CTS (includes L, LD, LE, and LF categories)
- Table LA of Less-Restrictive, Relocated Requirements Changes to the CTS LC
- Table R of Relocated Specifications

(includes LA and LC Categories)

The tables are only meant to summarize the changes being made to the CTS. The details, as to what the actual changes are and how they are being made to the CTS or ITS, are only provided in the licensee's application and supplemental letters.

The general categories of changes to the CTS requirements are described in more detail below.

A. Administrative Changes (A)

Administrative (non-technical) changes are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. Every section of the ITS reflects this type of change. In order to ensure consistency, the NRC staff and EGC have used STS as guidance to reformat and make other administrative changes. Among the changes proposed by EGC and found acceptable by the NRC staff are:

1 Providing the appropriate numbers, etc., for STS bracketed information (information that must be supplied on a plant-specific basis and that may change from plant to plant)

1 2 Identifying plant-specific wording for system names, etc.

NRC This is not part of CTS markups. It is in JFDs.

5. Deletion of TS whose applicability has expired.
6. Presentation changes that involve rewording or reformatting for clarity but which do not involve a change in requirements.

(2) Changing the wording of specification titles in the CTS to conform to STS.

(3) Splitting up requirements currently grouped under a single current specification to more appropriate locations in two or more specifications of ITS.

(4) Combining related requirements currently presented in separate specifications of the CTS into a single specification of ITS.

Table A lists the administrative changes proposed in ITS. Table A is organized by the corresponding ITS section DOC, and provides a summary description of the administrative change that was made, and CTS and ITS LCO references. The NRC staff reviewed all of the administrative and editorial changes proposed by EGC and finds them acceptable because they are compatible with the Writers Guide and STS, do not result in any substantive change in operating requirements, and are consistent with the Commission's regulations.

B. Technical Changes — More Restrictive (M)

EGC, in electing to implement the specifications of STS proposed a number of requirements more restrictive than those in the CTS. ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or have additional restrictions that are not in the CTS but are in the STS. Examples of more restrictive requirements are placing an LCO on plant equipment which is not required by the CTS to be operable, adopting more restrictive requirements to restore inoperable equipment, and adopting more restrictive SRs. Table M lists all the more restrictive changes proposed in ITS. Table M is organized by the corresponding ITS section DOC and provides a summary description of the more restrictive change that were adopted along with CTS and ITS LCO references. These changes are additional restrictions on plant operation that enhance safety. The staff reviewed these changes and found them to be acceptable.

C. Technical Changes — Less Restrictive (L, LB, LC, LD, LE and LF)

L, LB, LC, LD, LE and LF technical changes are grouped here to simplify discussion of the broad range of proposed less restrictive changes in technical requirements. L is used to designate a CTS change that requires a unique discussion. LB, LC, LD, LE and LF are used to identify a recurring change evaluated by a single discussion in the submittal. Less restrictive requirements include deletions and relaxations to portions of CTS requirements that are not being retained in ITS or relocated to an EGC-controlled document. When requirements have been shown to give little or no safety benefit, their relaxation or removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups' comments on STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The LaSalle design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in the STS and thus provide a basis for ITS.

7. Deletion of redundant TS requirements that exist elsewhere in the TS.
8. Wording changes and additions that are consistent with the CTS interpretation and practice, and that more clearly or explicitly state existing requirements.

A significant number of changes to the CTS involved deletions and relaxations to portions of CTS requirements evaluated as Categories 1 through 10 that follow:

the

Category 1 — Relaxation of LCO Requirements

of

Category 2 — Relaxation Applicability
Category 3 — Relaxation of Surveillance Requirement
Category 4 — Relaxation of Required Action Detail
Category 5 — Relaxation of Required Actions to Exit Applicability
Category 6 — Relaxation of Completion Time
Category 7 — Allow Mode Changes When LCO Not Met
Category 8 — Elimination of Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel
Category 9 — Elimination of CTS Reporting Requirement
Category 10 — Relaxation of Surveillance Frequency from 18 months to 24 months

The following discussions address why the various categories of changes are acceptable.

Category 1 - Relaxation of the LCO Requirements

Certain CTS LCOs contain operational and system parameters beyond those necessary to meet safety analysis assumptions and therefore are considered overly restrictive. CTS also contain limits which have been shown to give little or no safety benefit to the safe operation of the plant. The ITS, consistent with the guidance in the STS, delete or revise operating limits in this category. CTS LCO changes included in this category are: (1) revising setpoints to be consistent with instrument setpoint methodologies; (2) deleting or revising operational limits to establish requirements consistent with applicable safety analyses; (3) deleting equipment or systems which establish redundant system capability beyond that assumed to function by the applicable safety analyses or which are implicit to the ITS requirement for systems, components and devices to be operable; and (4) adding allowances to use administrative controls on plant devices and equipments during times when automatic control is required or to establish temporary administrative limits, as appropriate, to allow time for systems to establish equilibrium operations.

TS changes represented by these categories of requirements allow operators to more clearly focus on issues important to safety. The resultant ITS LCOs maintain an adequate degree of protection consistent with the safety analysis. They also improve focus on issues important to safety and provide reasonable operational flexibility without adversely affecting the safe operation of the plant. These changes are consistent with STS and are acceptable.

Category 2 - Relaxation of Applicability

when fuel is in the reactor vessel

The CTS require compliance with the LCO during the Operational Mode(s) or other conditions specified in the LCO Applicability statement. Five Operating Modes are defined by TS according to average reactor coolant temperature and the position of the reactor mode switch located in the control room; Power Operation, Startup, Hot Shutdown, Cold Shutdown and Refueling. When CTS Applicability requirements are inconsistent with the applicable accident analyses assumptions for a system, subsystem or component specified in the LCO, the LCO is changed in the ITS to establish a consistent set of requirements. These modifications or deletions are acceptable because, during the conditions referenced in the ITS, the operability

, and reactor vessel head closure bolt tensioning

requirements are consistent with the applicable safety analyses. These changes are consistent with STS and are acceptable.

Category 3 - Relaxation of Surveillance Requirement

CTS require maintaining the LCO equipment operable by meeting the SRs in accordance with the specified SR Frequency. This requires conducting tests to demonstrate equipment is operable, or that LCO parameters are within specified limits. When the test acceptance criteria and any specified conditions for the conduct of the test are met, the equipment is deemed operable. The changes in this category relate to relaxation of CTS SR acceptance criteria and/or the conditions for performing the SR.

Relaxing the SR acceptance criteria for these items provides operational flexibility consistent with the objective of the STS without reducing confidence that the equipment is operable. The ITS also permits the use of an actual, as well as a simulated, actuation signal to satisfy SRs for automatically actuated systems. TS required features cannot distinguish between an "actual" signal and a "test" signal. The changes to TS acceptance criteria are acceptable because appropriate testing standards are retained for determining that the LCO-required features are operable.

Relaxing conditions for performing SRs include, for example, not requiring testing of de-energized equipment (e.g., instrumentation Channel Checks) or equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). The changes also include the allowance to verify the position of valves in high radiation areas by administrative means. ITS administrative controls (ITS 5.7) regarding access to high radiation areas make the likelihood of mispositioning valves small. These changes are acceptable because the changes do not affect the ability to determine whether equipment is capable of performing its intended safety function.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. These changes are consistent with STS and are acceptable.

Category 4 - Relaxation of Required Action Detail

LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO is not met, CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. In revising the Required Actions, details are deleted or options are added such that resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. Furthermore, adopting STS action requirements results in simpler, more concise and more direct action requirements. This allows more effective use of operator resources for placing and maintaining the reactor in a safe condition when the LCO is not met. These changes are consistent with STS and are acceptable.

Category 5 - Relaxation of Required Actions to exit Applicability

LCOs are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO is not met, CTS specify actions to be taken until the

equipment is restored to its required capability or performance level, or remedial measures are established. Compared to CTS required actions, the ITS actions result in extending the time period for taking the plant outside the applicability into shutdown conditions. For example, changes in this category include providing an option to: isolate a system, place equipment in the state assumed by the safety analysis, satisfy alternate criteria, take manual actions in place of automatic actions, "restore to operable status" within a specified time frame, place alternate equipment into service, or use more conservative TS setpoints. The resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. The ITS actions are commensurate with safety importance of the inoperable equipment, plant design and industry practice and do not compromise safe operation of the plant. These changes are consistent with STS and are acceptable.

Category 6 - Relaxation of Completion Time

Upon discovery of a failure to meet an LCO, TS specify times for completing Required Actions of the associated TS conditions. Required Actions establish remedial measures that must be taken within specified completion times (allowed outage times). These times define limits during which operation in a degraded condition is permitted.

Incorporating completion time extensions is acceptable because completion times take into account the operability status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, vendor-developed standard repair times, and the low probability of a design basis accident (DBA) occurring during the repair period. These changes are consistent with STS, and allowed outage time extensions specified as Category 6 are acceptable.

Category 7 - Allow Mode Changes When LCO Not Met

4

CTS 3.0.7 (ITS 3.0.4) precludes entry into the applicable Mode or other specified conditions while relying on the Actions, even though the Actions are designed to provide for safe operation of the plant. Unless otherwise stated, LCO 3.0.4 is always applicable to ITS LCO Actions. However, ITS adds a Note to certain Actions stating "LCO 3.0.4 is not applicable." The addition of this Note allows transition between Applicability Modes or other specified conditions with the LCO not met (i.e., relying on the Actions) even though the Actions may require plant shutdown. The addition of "LCO 3.0.4 is not applicable" notes does not impact normal operation of the plant for the specified LCO features and would not provide additional initiators for plant transients during the Mode or other specified conditions. This exception to ITS 3.0.4 is acceptable due to the passive function or the installed redundancy of the features, the plant conditions that apply to the Note, and the low probability of an event requiring the inoperable features. These changes are consistent with STS and are acceptable.

Category 8 - Elimination of the Requirement to Lock the Reactor Mode Switch in Shutdown or Refuel

Some CTS LCOs and Actions specify "lock" the mode switch in "Shutdown" (shutdown position) or "Refuel" (refueling position). Other CTS Action requirements also specify placing the reactor in the shutdown or refueling Mode without requiring the mode switch to be "locked." The requirement to "lock" the mode switch in Shutdown or Refueling is not retained in the ITS. CTS Table 1-2, "Operational Modes" (ITS Table 1.1-1) defines reactor operational Modes based on

NRC Not needed - Also, You can be in Refuel Mode with the mode switch in Shutdown, Per ITS Table 1.1-1.

, among other requirements,

or Refuel

or Refuel may cause

the reactor mode switch position, and on average reactor coolant temperature. Moving a reactor mode switch from Shutdown into a position other than Shutdown causes a Mode change as defined by TS, and results in associated TS compliance requirements for the LCOs that become applicable in the new Mode. CTS 3.0.8 (ITS 3.0.4) precludes changes in reactor Modes without all TS required equipment operable. Thus, ITS 3.0.4 is an administrative requirement put in place to prevent movement of the reactor mode switch between positions without first ensuring TS required equipment is operable, and changing the mode switch from the required position is adequately controlled by ITS Table 1.1-1 without adding a requirement to "lock" the mode switch. These changes are consistent with the STS and are acceptable. (4)

Category 9 - Elimination of CTS Reporting Requirement

CTS include requirements to submit special reports to the NRC when specified limits or conditions are not met. Typically, the time period for the report to be issued is "within 30 days." However, the ITS eliminates the TS requirements for special reports and instead relies on the reporting requirements of 10 CFR 50.73. The changes to the reporting requirements are acceptable because 10 CFR 50.73 provides adequate reporting requirements, and the special reports do not affect continued plant operation.

CTS also include requirements for reports to be made to the NRC on data gathered as part of routine plant programs. These requirements are removed from the ITS. The requirement to report test frequency changes that occur due to consecutive SR failures has been deleted since the test schedule is already covered by the TS. In addition, a historical review has shown the SR has never failed.

Deleting TS reporting requirements reduces unnecessary regulatory burden on the plant and allows licensee efforts to be concentrated on maintaining TS required limits. These changes are consistent with the STS and are acceptable.

Category 10 - Relaxation of Surveillance Frequency from 18 months to 24 months (LD, LE and LF)

CTS require maintaining the LCO equipment operable by conducting SRs in accordance with the specified SR Frequency. The changes in this category relate to extending SR frequencies. Improved reactor fuels allow the licensee to consider an increase in the duration of the fuel cycle for their facility. TS that specify an 18-month surveillance interval are changed to specify a 24-month interval. The CTS 4.0.2 (ITS SR 3.0.2) provision to extend surveillances by 25 percent of the specified interval would extend the time limit for completing these surveillances from the CTS limit of 22.5 months to a maximum of 30 months. The staff review of these items is covered in more detail in Section G of this SE. These changes are consistent with the STS and are acceptable.

(2)

NRC Need to somehow identify that this is end of Category 10

(LB) Table L includes all L, LD, LE, and LF changes and is organized by ITS section. The table specifies: the section designation; a summary description of the change; CTS and ITS LCO references; a reference to the specific change category as discussed above; and a characterization of the DOC.

For the reasons presented above, these less restrictive requirements are acceptable because they will not affect the safe operation of the plant. The ITS requirements are consistent with

NRC We use LA's to relocate entire specs that meet the criteria of 10 CFR 50.36

current licensing practices, operating experience, and plant accident and transient analyses, and provide reasonable assurance that public health and safety will be protected.

D. Technical Changes — Less Restrictive Relocated Requirements ~~(Not Entire Specifications)~~ (LA) and LC

When requirements have been shown to give little or no safety benefit, their removal from the TS may be appropriate. These are grouped as LA and LC changes. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments on STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The LaSalle design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in the STS and thus provide a basis for ITS. A significant number of changes to the CTS involved the removal of specific requirements and detailed information from individual specifications evaluated to be Types 1 through 3 that follow:

Type 1	Details of System Design and System Description including Design Limits
Type 2	Descriptions of Systems Operation
Type 3	Procedural Details for Meeting TS Requirements, Reporting Requirements, and Specification Requirements

The following discussions address why each of the three types of information or requirements is not required to be included in ITS. (including the Technical Requirements Manual (TRM))

Type 1 Details of System Design and System Description Including Design Limits

The design of the facility is required to be described in the UFSAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings and maintained in accordance with an NRC-approved QA plan (UFSAR Chapter 17). In 10 CFR 50.59, controls are specified for changing the facility as described in the UFSAR~~,~~ and in 10 CFR 50.54(a) criteria are specified for changing the QA plan. The ITS Bases also contain descriptions of system design. ITS 5.5.~~10~~ 11 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled in the UFSAR, ~~controlled design documents and drawings,~~ or the ITS Bases, as appropriate. Cycle-specific design limits are contained in the Core Operating Limits Report (COLR). ITS Administrative Controls include the programmatic requirements for the COLR.

Type 2 Descriptions of Systems Operation (including the TRM)

The plans for the normal and emergency operation of the facility are required to be described in the UFSAR by 10 CFR 50.34. ITS 5.4.1.a requires written procedures to be established, implemented, and maintained for plant operating procedures including procedures

NRC Did not move anything to plant procedures.

(including the TRM)

recommended in Regulatory Guide (RG) 1.33, Revision 2, Appendix A, February 1978. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the UFSAR. The ITS Bases also contain descriptions of system operation. It is acceptable to remove details of system operation from the TS because this type of information will be adequately controlled in the UFSAR, ~~plant operating procedures~~ and the TS Bases, as appropriate.

Type 3 Procedural Details for Meeting TS Requirements, Reporting Requirements, and Specification Requirements

Details for performing TS Actions and SRs are more appropriately specified in the plant procedures required by ITS 5.4.1, the UFSAR, and ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in GL 91-04, allowing this procedural control is consistent with the vast majority of other SRs that do not dictate plant conditions for surveillances. Prescriptive procedural information in an Action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures is therefore required in any event. Other changes to procedural details include those associated with limits retained in the ITS. For example, the ITS requirement may refer to programmatic requirements such as COLR, included in ITS Section ~~5.6~~ 6, which specifies the scope of the limits contained in the COLR and mandates NRC approval of the analytical methodology.

NRC Need to discuss process for ODCM, ISI Program and QA manual

Relocating specification requirements, including LCO, required actions, and surveillance requirements, have been made in adopting the STS. For example, for certain power operated isolation valves that do not receive an automatic isolation signal and for which the closure time is not assumed in the safety analysis, requirements for periodic testing of these valves are moved to the procedures that implement the inservice testing program (10 CFR 50.55a). Support system specification requirements for other equipment with its own specifications are moved to the TRM. The definition of operability provides sufficient assurance that the supporting system can perform its required support function.

(including the TRM)

The removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled in the UFSAR, ~~plant procedures~~ Bases, and COLR, as appropriate. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. Similarly, movement of reporting requirements from LCOs to licensee-controlled documents is appropriate because ITS 5.6, 10 CFR 50.36 and 10 CFR 50.73 adequately cover the reports deemed to be necessary.

Not in LA DOCs

and LC

Table LA consists of LA changes. Table LA lists CTS specifications and describes the information that is removed from individual specifications and deleted or relocated to EGC-controlled documents. Table LA is organized by ITS section and includes the following: a DOC identification number referenced to ITS Section; a CTS reference; a summary description of the requirement; the document that retains the CTS requirements; and the specific change type, as discussed above.

The NRC staff has concluded that these types of detailed information and specific requirements are not necessary in the ITS to ensure the effectiveness of ITS to adequately protect the health

and safety of the public. Accordingly, these requirements may be ~~deleted or~~ moved to one of the following EGC-controlled documents for which changes are adequately governed by a regulatory or TS requirement:

(1) TS Bases controlled by ITS 5.5.~~14~~ 11, "Technical Specifications Bases Control Program."
(2) UFSAR (includes the Technical Requirements Manual (TRM) by reference) controlled by 10 CFR 50.59.
(3) ODCM controlled by ITS 5.5.1, "Offsite Dose Calculation Manual."
(4) QA Manual controlled by 10 CFR 50.54.
(5) Inservice Testing Program controlled by ITS 5.5.~~6~~ 7, "Inservice Testing Program" and 10CFR 50.55a.

< Delete Line Space >

(6) Inservice Inspection ~~p~~Program controlled by 10 CFR 50.55a.
(7) Core Operating Limits Report controlled by ITS 5.6.5, "Core Operating Limits Report (COLR)."

To the extent that requirements and information have been relocated to EGC-controlled documents, such information and requirements are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, where such information and requirements are contained in LCOs and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria in the Final Policy Statement (discussed in Part II of this SE). Accordingly, existing detailed information and specific requirements, such as generally described above, may be deleted from the CTS.

E. Relocated Specifications (R)

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria may be relocated from CTS (an NRC-controlled document) to appropriate licensee-controlled documents. These requirements include the LCOs, Action Statements (Actions), and associated SRs. EGC proposed, in accordance with the criteria in the Final Policy Statement, to entirely remove certain TS from the CTS and place them in EGC-controlled documents. The staff has reviewed EGC's submittals, and finds that relocation of these requirements to licensee-controlled documents (described above) is acceptable in that changes to these documents will be adequately controlled by 10 CFR 50.59 and other regulations (described above). These provisions will continue to be implemented by appropriate plant procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R lists all specifications that are relocated, based on the Final Policy Statement, to EGC-controlled documents. Table R provides: a DOC identification number referenced to ITS Section; a CTS reference; a summary description of the requirement; the name of the document that retains the CTS requirements; and the method for controlling future changes to relocated requirements. The NRC staff evaluation of each relocated specification and specific CTS detail presented in Table R is provided below.

3/4.1.6 Economic Generation Control System

requirements

The Economic Generation Control System limits are relocated to the TRM. CTS 3/4.1.6 specify that the economic generation control system (EGCS) may be in operation with automatic flow control provided that core flow is ≥ 65% of rated core flow, and thermal power is greater than or equal to 20% of rated thermal power. The system was designed to allow the load dispatcher to control power output of the station within appropriate limits based on reactor operating conditions. These EGCS limiting conditions for operation were chosen to be well within the analyzed system setpoints utilized in design basis accident (DBA) and transient analyses; however, the EGCS limits do not rely on any assumptions used in DBA or transient analyses. The requirements of the EGCS LCO do not meet the requirements for TS and have been relocated to the TRM.

are not relied on for

3/4.3.1 Reactor Protection System Instrumentation

The Control Rod Drive Charging Water Header Pressure - Low Function and associated timer function of the Reactor Protection System are relocated to the TRM. CTS 3/4.3.1 specifies that as a minimum, the reactor protection system instrumentation channels shown in Table 3.3.1-1 shall be operable with the Reactor Protection System (RPS) Response Time as shown in Table 3.3.1-2. The Control Rod Drive Charging Water Header Pressure - Low Function and associated time delay Function provide a reactor scram signal when a low control rod drive (CRD) charging water header condition is detected. CRD charging water pressure is normally maintained by a CRD pump with a backup source of pressure supplied by an accumulator. If the CRD pump is tripped, pressure to the control rod drives is maintained by the accumulator and a check valve in the charging line.

In the CTS this scram is only required to be operable in Modes 2 and 5 when reactor pressure is low and control rods are permitted to be withdrawn because during normal operation, reactor pressure is continuously applied to the control rod drive piston and this pressure is sufficient to insert the rod without the accumulator pressure. However, loss of charging water header pressure in Modes 2 and 5 will only inhibit a control rod scram if the CRD accumulators are concurrently inoperable and incapable of providing the pressure needed to insert the control rods. In addition, the ITS requires that the accumulators be operable in Mode 2 , and if they are not, the affected control rods would be declared inoperable or slow, depending upon the most recent scram times. Also, upon loss of two or more accumulators when reactor vessel pressure is ≥ 900 psig or one accumulator when reactor vessel pressure is less than 900 psig, the charging water header must be at normal pressure or a scram is required (within 20 minutes when reactor vessel pressure is ≥ 900 psig and immediately when reactor vessel pressure is < 900 psig). In Mode 5 the ITS requires that the accumulators be operable and if they are not, the inoperable rods are required to be inserted. These requirements will ensure that the motive force required to scram the control rods will be available when needed. The RPS limits for Control Rod Drive Charging Water Header Pressure - Low (CTS 3/4.3.1.13.a) and for associated the Control Rod Drive Delay Timer (CTS 3/4.3.1.13.b) functions are not assumed in any design basis or transient analyses and are therefore relocated to the TRM.

3/4.3.3 Emergency Core Cooling System (ECCS) Actuation Instrumentation

The ADS Manual Inhibit Functions for Trip Systems A and B of the ECCS Actuation Instrumentation are relocated to the TRM. CTS 3/4.3.3 specifies that the ECCS actuation

instrumentation channels shown in Table 3.3.3-1 shall be operable with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.3-2 and with Emergency Core Cooling System Response Time as shown in Table 3.3.3-3. ECCS instrumentation functions for ADS 'A' - Manual Inhibit (3/4.3.3.A.2.i) and ADS 'B' - Manual Inhibit (3/4.3.3.B.2.h) are relocated to the TRM. The ADS Manual Inhibit switch allows the operator to defeat automatic ADS actuation, as directed by the emergency operating procedures, under conditions for which ADS would not be desirable. However, such manual operator action is not credited in a design basis accident or transient analysis. For example, during an ATWS event low pressure ECCS system activation would dilute sodium pentaborate injected by the Standby Liquid Control (SLC) System thereby reducing the effectiveness of the SLC System ability to shutdown. The assumptions used in the DBA or transient analyses do not require ADS manual inhibit functions. The requirements for ADS manual inhibit to be operable do not meet the requirements for TS and have been relocated to the TRM. Since the screening criteria have not been satisfied, the portions of the LCO and surveillance applicable to the ADS Manual Inhibit switch may be relocated to other plant controlled documents outside the Technical Specifications.

3/4.3.6 Control Rod Withdrawal Block Instrumentation

The CTS requires the control rod withdrawal block instrumentation channels shown in Table 3.3.6-1 to be operable with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.6-2. Several control rod withdrawal block instrumentation functions are relocated to the TRM.

3/4.3.6.2 Average Power Range Monitors (APRM)

The APRM control rod block instrumentation is installed to prevent conditions that would otherwise require actuation of the RPS if plant conditions were allowed to persist, such as during a "control rod withdrawal error at power." The APRMs use LPRM signals to provide information about the average core power and to create the APRM rod block signal. However, the rod block function of the APRMs is not used to mitigate a DBA or transient.

3/4.3.6.3 Source Range Monitor (SRM)

The SRM control rod block instrumentation is installed to monitor neutron flux during refueling, shutdown, and startup conditions. When IRMs are not above Range 2, the SRM control rod block prevents a control rod withdrawal if the count rate exceeds a preset value or falls below a preset limit. However, the rod block signals initiated by the SRMs are not used to mitigate a DBA or transient.

3/4.3.6.4 Intermediate Range Monitors (IRM)

The IRM control rod block instrumentation is installed to monitor the neutron flux levels during refueling, shutdown, and startup conditions. The IRM control rod block prevents a control rod withdrawal if the IRM reading exceeds a preset value, or if the IRM is inoperable. However, the rod block signals initiated by the IRMs are not used to mitigate a DBA or transient.

3/4.3.6.5 Scram Discharge Volume (SDV)

The Scram Discharge Volume (SDV) control rod block instrumentation uses signals derived from SDV level monitors to prevent control rod withdrawals when accumulated water reaches a pre-set level in the SDV. This instrumentation ensures there is sufficient volume remaining in the SDV to contain the water discharged by the control rod drives during a scram, thus ensuring that the control rods will be able to insert fully. This rod block signal also provides an indication to the operator that water is accumulating in the SDV and prevents further rod withdrawals. With continued water accumulation, a reactor protection system initiated scram signal will occur. Thus, the SDV water level rod block signal provides an opportunity for the operator to take action to avoid a reactor scram. However, the rod block signals initiated by the SDV instrumentation is not used to mitigate a DBA or transient.

3/4.3.6.6 Recirculation Flow Unit

Reactor recirculation flow is monitored as an early indication of an increase in neutron flux and reactor power. The recirculation flow converter upscale or flow converter inoperative initiate a control rod withdrawal block to prevent a continued increase in power without operable monitoring instrumentation. The recirculation flow comparator prevents control rod withdrawal unless the outputs are within limits and the comparator is operable. However, flow increases are detected by neutron flux monitors which provide input to the reactor protection system. The control rod block signals initiated by the recirculation flow unit are not used to mitigate a DBA or transient.

3/4.3.7.3 Meteorological Monitoring Instrumentation

Meteorological monitoring instrumentation are relocated to the TRM. The CTS requires the meteorological monitoring instrumentation channels shown in Table 3.3.7.3-1 to be OPERABLE. Meteorological instrumentation measures environmental parameters that may affect distribution of fission products and gases following a design basis accident (DBA). Meteorological information is required to evaluate the need for initiating protective measures to protect the health and safety of the public; however, the information collected from the meteorological monitoring instrumentation is not used to monitor or mitigate a DBA or transient.

3/4.3.7.5 Accident Monitoring Instrumentation non-Category I

All Regulatory Guide 1.97 non-Type A instruments and all Regulatory Guide 1.97 non-Category 1 instruments specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97 are relocated to the TRM. The CTS require the accident monitoring instrumentation channels shown in Table 3.3.7.5-1 to be operable. Accident monitoring instrumentation is provided to monitor variables and systems over their anticipated ranges for accident conditions as appropriate to ensure adequate safety during and following accidents. These variables are used by the control room operating personnel to perform their role in the emergency plan in the evaluation and assessment, monitoring and execution of control room functions when other emergency response facilities are not effectively manned.

The NRC staff documented deterministic screening criteria for post-accident monitoring instrumentation in letter dated May 7, 1988 from T.E. Murley (NRC) to R.F. Janecek (BWROG). The staff requires all plant-specific Regulatory Guide 1.97 Type A instruments specified in the

plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97, and all Regulatory Guide 1.97 Category 1 instruments to be included in ITS. Accordingly, this position has been applied to the LaSalle 1 and 2 Regulatory Guide 1.97 instruments.

The CTS accident monitoring instruments that do not meet the RG 1.97 deterministic criteria and which are relocated include: suppression chamber air temperature, drywell air temperature, safety/relief valve position indicators, noble gas monitor-main stack and noble gas monitor-standby gas treatment system stack. Those instruments meeting the criteria, including neutron flux (wide range) monitors are retained by the ITS criteria. However, category 1 requirements as they relate to the neutron flux (wide range monitor) are revised. The BWR Owners Group submitted a Licensing Topical Report, NEDO-31558, that provided alternative neutron monitoring functional design criteria to that of RG 1.97. By letter dated January 13, 1993 the staff found the BWR Owners Group the alternate design criteria acceptable. Based on the acceptance letter LaSalle 1 and 2 reclassified the neutron flux (wide range) monitor as neither a Type A ~~or~~ nor a Category 1 variable. Therefore, the neutron flux (wide range monitor) is not added to the ITS.

3/4.3.7.11 Explosive Gas Monitoring Instrumentation

Explosive gas monitoring instrumentation are relocated to the TRM. The CTS require explosive gas monitoring instrumentation channels shown in Table 3.3.7.11-1 to be operable with their Alarm/Trip setpoints set to ensure that the limits of specification 3.11.2.1 are not exceeded. The explosive gas monitoring instrumentation monitors the gaseous radwaste treatment system process for potentially explosive gas mixtures to ensure that hydrogen concentration is maintained below the flammability limit. However, the offgas system is designed to contain detonations without affecting safety related equipment functions. Neither the concentration of hydrogen in the offgas stream, nor the instrumentation used to monitor the hydrogen concentration are an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.3.7.12 Loose-part Detection System

Loose-part detection system requirements are relocated to the TRM. The CTS require the loose-part detection system to be operable. The loose-part detection system is used to detect the presence of loose parts in the reactor vessel. The presence of a loose part indicates there is a potential for damaging components; however, loose-part detection instrumentation is not used for quantifying degradation of the primary coolant pressure boundary. Other component failures related to loose parts, such as fuel failure due to fuel bundle flow blockage from a lost part will be detected by the radiation monitors in the offgas stream. The instrumentation for monitoring loose parts are not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.4.8 Structural Integrity

The CTS require the structural integrity of ASME Code Class 1, 2 and 3 components (pumps and valves) to be maintained operable in accordance with Specification 4.4.8 are relocated to the TRM. Specification 4.4.8 establishes the programmatic elements for conducting ASME Code Class 1, 2, and 3 component inspections by reference to Section XI of the ASME Boiler and Pressure Vessel Code. The safety basis for establishing programmatic requirements on structural integrity in CTS relate to prevention of component degradation and continued long

term maintenance of acceptable structural conditions. Therefore, structural integrity of safety systems are not operational limits that are an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.7.4 Sealed Source Contamination requirements

Sealed Source Contamination limits are relocated to the TRM. CTS specifies removable contamination limits for sealed sources. Each sealed source containing radioactive material in excess of 100 microcuries of either beta or gamma emitting material or 5 microcuries of alpha emitting material shall be free of greater than or equal to 0.005 microcuries of removable contamination. These limits ensure that the total body or individual organ irradiation doses do not exceed ingestion or inhalation limits. This TS requirement and the associated Surveillance Requirements do not relate to the operational conditions or limitations that are necessary to ensure safe reactor operation. Sealed source contamination limits are not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.7.7 Area Temperature Monitoring

Area temperature monitoring requirements are relocated to the TRM. CTS require maintaining the temperatures of the areas of Unit 1 and Unit 2 specified in Table 3.7.7-1 within the limits indicated in the table. Area temperature monitors ensure the environmental conditions for safety-related equipment do not exceed environmental qualification envelope assumed for the equipment. Area temperature monitoring instrumentation is separate from leak detection and system isolation instrumentation used to detect or mitigate a DBA such as break detection and leak isolation. Area temperature monitoring instrumentation is not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.7.8 Structural Integrity of Class 1 Structures

Requirements for maintaining structural integrity of Class 1 structures are relocated to the TRM. CTS 4.7.8.1 and 4.7.8.2 require periodic verification of the structural integrity of Class 1 structures. These TS establish surveillance to monitor Class 1 structures subject to settlement. By ensuring that excessive differential and total settlement is detected, the safety analysis assumptions of Class 1 structures housed in these structures on the LaSalle site are maintained. However, monitoring structural settlement is not related to operational limits that are an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.8.3.1 A.C. Circuits Inside Primary Containment

CTS requirements that specify A.C. circuits inside primary containment shall be de-energized, except during entry into the drywell, are relocated to the TRM. A.C. circuits included in the CTS are the following: (a) installed welding grid systems 1A and 1B for Unit 1, and 2A and 2B for Unit 2, (b) all drywell lighting circuits, (c) all drywell hoists and cranes circuits. These circuits are installed to supply power primarily for lighting, utility outlets, and convenient power plugs; used to conduct plant walk downs, maintenance, and in-situ tests and/or observations. These circuits are non-Class 1E circuits which are de-energized except during drywell entries and are not assumed to be energized in response to plant accidents or transients. The circuits are physically separated from Class 1E circuits such that their operation or failure will not affect operability of Class 1E circuits. A.C. circuits inside primary containment do not establish

properly

NRC Per our submittal and NUREG-0519 Section 8.4.6.3

operational requirements for plant safety systems and the circuits listed are not an initial assumption of any design basis accident (DBA) or transient analysis.

3/4.8.3.2 Primary Containment Penetration Conductor Overcurrent Protective Devices

Primary containment penetration conductor overcurrent protective devices are relocated to the TRM. CTS require that primary containment penetration conductor overcurrent protective devices for medium and high voltage (6.9 kV, 4.16 kV and 480 volts) electrical penetration circuits shall be operable. This LCO excludes devices on circuits for which credible fault currents would not exceed the electrical penetration design rating. These protective devices will interrupt control and power circuits by opening the circuit whenever the load conditions exceed the preset current demands to protect the circuit conductors against damage or failure due to overcurrent heating effects. In the event a protective device fails to trip the circuit, an alternate protective device is installed to isolate the faulted circuit. Thus, this protection design ensures the worst case fault condition is the loss of a single (redundant) division of protective functions as required by the single failure design criterion.

The overcurrent protection devices also ensure the pressure integrity of the containment penetration. With failure of a device, wire insulation is postulated to degrade resulting in a containment leak path during a LOCA. However, penetration conductor integrity is not directly monitored, rather it is assumed that containment penetration degradation will be identified during the normal containment leak rate tests required by 10 CFR Part 50, Appendix J. Overcurrent protective devices are not operational limits that are an initial assumption of any design basis accident (DBA) or transient analysis.

NRC (See Comment 6)

3/4.9.4 Decay Time

The minimum required decay time (24 hours) prior to fuel movement ensures sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with assumptions used in the accident analyses. However, preparing to move fuel requires operations (e.g., containment entry, removal of drywell head, removal of vessel head, removal of vessel internals) involving the reactor vessel that require more than 24 hours to complete. Thus, although CTS 3/4.9.4, Decay Time, may satisfy Criterion 2 of the Technical Specifications Selection Criteria in 10 CFR 50.36 (c)(2)(ii), the 24 hour decay time limit following subcriticality is a time limit that will always be met for a refueling outage because the plant cannot be placed in a condition that would violate decay time TS requirements. Therefore, the decay time requirement does not result in a limiting condition for reactor operation.

3/4.9.5 Communications

Communication requirements are relocated to the TRM. CTS specify that direct communications are to be maintained between the control room and refueling platform personnel to ensure that refueling personnel can be promptly informed of significant changes in the plant status or core reactivity condition during refueling operations. Communications between control room and refuel platform personnel are necessary for coordinating activities such as the insertion of control rods prior to loading fuel. However, operable control room communications with refueling platform personnel is not an assumption for response to refueling system failures, or design accident or transient response.

3/4.9.6 Crane and Hoist

Crane and hoist requirements are relocated to the TRM. CTS specify that all cranes and hoists (fuel hoist and auxiliary hoist) used for handling fuel assemblies or control rods within the reactor pressure vessel are to be operable. These TS ensure that hoists have sufficient load capacity for handling fuel assemblies and/or control rods and the core internals and pressure vessel are protected from excessive lifting force if they are inadvertently engaged during lifting operations. The interlocks designed to provide the above protection capabilities can prevent damage to the refueling platform equipment and core internals they are; however, not assumed to function to prevent or mitigate the consequences of a design basis accident.

NRC

decay time does not meet criteria

The relocated CTS discussed above are not required to be in the TS under 10 CFR 50.36 and do not meet any of the four criteria in the Final Policy Statement. They are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, the NRC staff finds that sufficient regulatory controls exist under the regulations cited above to maintain the effect of the provisions in these specifications. The NRC staff has concluded that appropriate controls have been established for all of the current specifications, information, and requirements that are being moved to EGC-controlled documents. This is the subject of a license condition established herewith. Until incorporated in the UFSAR and procedures, changes to these specifications, information, and requirements will be controlled in accordance with the applicable current procedures that control these documents. Following implementation, the NRC will audit the removed provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59. Accordingly, these specifications, information, and requirements, as described in detail in this SE, may be relocated from CTS and placed in the UFSAR or other EGC-controlled documents as specified in EGC's letter of **date.**

TRM

F. Control of Specifications, Requirements, and Information Removed from the CTS

The facility and procedures described in the UFSAR and TRM, incorporated into the UFSAR by reference, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures records are maintained and establishes appropriate control over requirements removed from CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with other applicable regulatory requirements: for example, the ODCM can be changed in accordance with ITS 5.5.1; the emergency plan implementing procedures (EPIPs) can be changed in accordance with 10 CFR 50.54(q); and the administrative instructions that implement the QA Plan can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. Temporary procedure changes are also controlled by 10 CFR 50.54(a). The documentation of these changes will be maintained by EGC in accordance with the record retention requirements specified in EGC's QA plan for LaSalle and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS addresses the implementation of the ITS conversion and when the relocation of the CTS requirements into licensee-controlled documents will be completed. The submittal of the updated licensee-controlled documents (e.g., UFSAR) to the Commission will be as required by, and in

accordance with, the regulations (e.g., 10 CFR 50.71(e) for the updated UFSAR), and not be as part of the implementation of the ITS.

G. Other TS Changes Included in the Application

This section evaluates other TS changes included in EGC's ITS conversion application. These include items which deviate from both the CTS and the STS, do not fall clearly into a category, or are in addition to those changes that are needed to meet the overall purpose of the conversion.

Conversion to ITS Section 3.6.1.3

CTS 4.6.1.1.~~b~~a verifies that all penetrations not capable of being closed by automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges or deactivated automatic valves secured in their position, except as provided in CTS 3.6.3. In the ITS, this surveillance is ~~relocated~~ moved from the CTS Primary Containment Integrity specification (CTS 3/4.6.1.1) to the ITS Primary Containment Isolation Valve Specification (ITS 3.6.1.3) and broken up into two specifications - one for valves and blind flanges outside containment and one for valves and blind flanges inside containment. During the review of the licensee's submittal, a difference of opinion arose between the staff and the licensee as to what would constitute a failure of this CTS surveillance and what appropriate actions should be taken. The staff concedes that the wording and structure of the LaSalle CTS would allow several interpretations of how CTS 4.6.1.1.~~b~~a is to be met, what actions to take if the surveillance is not met, and which ITS Action Notes are implied by the CTS wording in CTS 3/4.~~7.A~~6.1.1. Depending on the interpretation, the change from the CTS to the ITS could be characterized as Administrative, More Restrictive, Less Restrictive, or a combination thereof.

In addition, the staff concedes that there are several interpretations of how CTS ~~3.6.M~~3.4.7 Action and ~~3.7.D~~3.6.3 Action a can be applied to penetrations with one primary containment isolation valve. One interpretation would require an immediate shutdown since there is no other OPERABLE isolation valve. Another interpretation considers the closed system boundary as the other OPERABLE isolation valve. Depending on which interpretation is used, the change from the CTS to ITS 3.6.1.3 Action C could be characterized as Administrative, Less Restrictive, or a combination of the two.

One objective of the conversion to the ITS is to correct these types of problem areas. The LaSalle ITS provide the appropriate SRs and Actions, if the surveillances are not met, to correct the ambiguity of the CTS while not degrading the safe operation of the plant. Thus, the staff finds that ITS 3.6.1.3 is acceptable.

Conversion to 24 Month Surveillance Interval (LD and LE~~, LF~~)

Improved reactor fuels allow licensees to consider increasing the duration of the fuel cycle for their facilities. The staff has reviewed and approved a number of requests to extend surveillance requirements to accommodate a 24-month fuel cycle. The staff has found that the effect on plant safety is small because safety systems use redundant electrical and mechanical components and because licensees perform other surveillances during plant operation that confirm that these systems and components can perform their safety functions.

Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," issued on April 2, 1991, provides staff guidance that identifies the types of information that must be addressed when proposing extensions of the fuel cycle to 24 months. The GL addressed steam generator inspections (which are not applicable to LaSalle), leak rate testing pursuant to Appendix J to 10 CFR Part 50 (which is not applicable to LaSalle because individual leak testing requirements have been replaced by the Primary Containment Leakage Rate Testing Program), instrument drift, and other 18-month surveillances that are extended to 24 months.

The GL requires that licensees address instrument drift when proposing an increase in the surveillance interval for calibrating instruments that perform safety functions including providing the capability for safe shutdown. The effect of the increased calibration interval on instrument errors must be addressed because instrument errors caused by drift were considered when determining safety system setpoints and when performing safety analyses.

For the remaining 18-month surveillances, the GL requires the following information to support conversion to a 24-month operating cycle:

(1) Licensees should evaluate the effect on safety of an increase in 18-month surveillance intervals to accommodate a 24-month fuel cycle. This evaluation should support a conclusion that the effect on safety is small.

(2) Licensees should confirm that historical plant maintenance and surveillance data support this conclusion.

(3) Licensees should confirm that assumptions in the plant licensing basis would not be invalidated on the basis of performing any surveillance at the bounding surveillance interval limit provided to accommodate a 24-month fuel cycle.

In consideration of these confirmations, the staff concluded that licensees need not quantify the effect of the change in surveillance intervals on the availability of individual systems or components.

INSTRUMENT DRIFT

The staff's review grouped the instrumentation changes together. This primarily includes extensions of channel calibrations and logic system functional tests from 18 to 24 months.

By letter dated March 3, 2000, the licensee submitted a request to amend the Facility Operating Licenses for Dresden, LaSalle, and Quad Cities nuclear power plants. The amendment proposes changes to the technical specifications (TS) to extend the surveillance intervals for selected TS items from 18 months to 24 months. By letter dated March 24, 2000, the licensee submitted the methodology used for the determination of instrument setpoints and allowable values. On April 27, 2000, a meeting was held with the licensee to discuss the staff request for additional information and by letter dated June 5, 2000, the licensee provided the information requested by the staff. On August 22 and 23, a meeting was held with the licensee to review their sample calculations. During that meeting, the staff identified some concerns with the

licensee's response of June 5, 2000, and by letter dated November 30, 2000, the licensee provided the response to resolve the staff's concerns.

GL 91-04 required that information in seven specific areas be addressed in order to provide an acceptable basis for increasing the calibration interval for instruments that are used to perform safety functions. The following discussion identifies these seven areas and includes a summary of the licensee's response along with the staff's conclusions.

(1) Confirm that instrument drift as determined by as-found and as-left calibration data from surveillance and maintenance records have not, except on rare occasions, exceeded acceptable limits for a calibration interval.

(2) Confirm that the values of drift for each instrument type (make, model, and range) and application have been determined with a high probability and a high degree of confidence. Provide a summary of the methodology and assumptions used to determine the rate of instrument drift with time based upon historical plant calibration data.

(3) Confirm that the magnitude of instrument drift has been determined with a high probability and a high degree of confidence for a bounding calibration interval of 30 months for each instrument type (make, model number, and range) and application that performs a safety function. Provide a list of the channels by TS section that identifies these instrument applications.

(4) Confirm that a comparison of the projected instrument drift errors has been made with the values of drift used in the setpoint analysis. If this results in revised setpoints to accommodate large drift errors, provide proposed TS changes to update trip setpoints. If the drift errors result in a revised safety analysis to support existing setpoints, provide a summary of the updated analysis conclusions to confirm that safety limits and safety analysis assumptions are not exceeded.

(5) Confirm that the projected instrument errors caused by drift are acceptable for control of plant parameters to effect a safe shutdown with the associated instrumentation.

(6) Confirm that all conditions and assumptions of the setpoint and safety analyses have been checked and are appropriately reflected in the acceptance criteria of plant surveillance procedures for channel checks, channel functional tests, and channel calibrations.

(7) Provide a summary description of the program for monitoring and assessing the effects of increased calibration surveillance intervals of instrument drift and its effect on safety.

The licensee performed a safety assessment for the proposed changes to the surveillance test intervals in accordance with the GL 91-04 guidance stated above. This assessment entailed reviewing the historical maintenance and surveillance test data at the bounding surveillance test interval limit, performing an evaluation to ensure that a 24-month surveillance test interval would not invalidate any assumption in the plant licensing bases, and the determination that the effect of the surveillance interval extension is small.

In their submittals of March 3, and 24, 2000, the licensee identified Nuclear Engineering Standard NES-EIC-20.04, Rev. 1, "Analysis of Instrument Channel Setpoint Error and

Instrument Loop Accuracy," which included Appendix J, "Guidelines For the Analysis and Use of As-Found/As-Left Data," as the basis for performing analyses of drift for all affected instrument loops in order to establish the effect of a 30-month (24 months + 25% allowable tolerance) calibration frequency on instrument performance. This appendix is based on Electric Power Research Institute (EPRI) TR-103335, "Guidelines for Instrument Calibration Extension/Reduction Programs," Rev. 1, October 1998. The licensee has used Microsoft Excel spreadsheets to document information for performing additional analyses to be consistent with the analyses recommended by NRC in its safety evaluation report (SER) for the Peach Bottom Atomic Power Station, Units 2 and 3.

During the meeting of April 27, 2000, the staff identified concerns with the licensee's sample data, outlier determination, time dependency, the graded approach to instrument setpoint determination (Appendix D to the Nuclear Engineering Standard), and miscellaneous other items. Based on the staff's comments, the licensee, by letter dated June 5, 2000, submitted the revised Nuclear Engineering Standard and their justification for surveillance extensions. The staff reviewed the revised documents and was still concerned with the outlier determination, time dependency, and the graded approach to instrument setpoint determination. However, during a conference call the licensee was able to satisfy the staff's concerns and it was decided to have a meeting to review some sample calculations to better understand the licensee's methodology. The staff reviewed the sample calculations and determined the licensee's approach acceptable but wanted the licensee to revise the Nuclear Engineering Standard to clearly describe their methodology. Based on this, the licensee provided Rev. 3 of the Nuclear Engineering Standard and submitted a letter dated November 30, 2000, to state that graded approach to setpoint determination has not been used by the licensee.

The staff has reviewed the licensee's submittals, including the responses to additional information, and has verified that the licensee has addressed the issues identified in GL 91-04 and provided an acceptable basis for increasing the calibration interval and for determining the instrument setpoint and allowable values for instruments that are used to perform safety functions. On the basis of the evaluation, the staff concludes that the licensee has confirmed that safety limits and safety analysis assumptions will not be exceeded after the worst-case drift is considered for the instruments whose surveillance intervals will be extended to 24 months.

On the basis of its review, the staff concludes that the proposed methodology for extending surveillance intervals for certain safety-related instrumentation components is consistent with the guidance in GL 91-04 in that the licensee has demonstrated that the effect of extending the surveillance intervals to 24 months is negligible and the system will continue to perform within assumed limits during the longer surveillance interval. The staff also finds that the instrument setpoint methodology used by the licensee to determine the allowable values is acceptable.

NON-INSTRUMENTATION CHANGES

Regarding non-instrumentation changes, GL 91-04 requires licensees to evaluate the effect on safety of the change in surveillance intervals to accommodate a 24-month fuel cycle. This evaluation should support a conclusion that the effect on safety is small. In addition, licensees should confirm that the performance of surveillances at the bounding surveillance interval limit provided to accommodate a 24-month fuel cycle would not invalidate any assumption in the plant licensing basis. In consideration of these confirmations, the licensees need not quantify

the effect of the change in surveillance intervals on the availability of individual systems or components.

To address the requirements of the GL 91-04, the licensee has referenced the NRC SER (dated August 2, 1993) relating to the extension of the Peach Bottom Units 2 and 3 surveillance intervals from 18 months to 24 months. In this SER, the staff stated the following:

> *Industry reliability studies for boiling water reactors (BWRs), prepared by the BWR Owners Group (NEDC-30936P) show that the overall safety systems' reliabilities are not dominated by the reliabilities of the logic system, but by that of the mechanical components, (e.g., pumps and valves), which are consequently tested on a more frequent basis. Since the probability of a relay, or contact failure is small relative to the probability of mechanical component failure, increasing the Logic System Functional Test interval represents no significant change in the overall safety system unavailability.*

The licensee has reviewed the surveillance test history at LaSalle and has validated this conclusion. The licensee's review has demonstrated that there are no failures that would invalidate the conclusion that the impact, if any, on system availability is minimal from a change to a 24-month operating cycle.

The following discussion describes how the staff determined that the effect of extending surveillance intervals on plant safety is small. The staff's review focused on redundant electrical and mechanical components as well as other surveillances conducted during plant operation that confirm that these systems and components can perform their safety functions.

<u>TS 3.1.7</u> <u>Standby Liquid Control System</u>

<u>SR 3.1.7.8 and 3.1.7.9</u>

> These SRs ensure that the Standby Liquid Control System is capable of injecting into the reactor pressure vessel by verifying a flow path and by firing one of the explosive valves.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency will be small:

- The licensee reviewed historical maintenance and surveillance data which shows that these tests normally pass at the current frequency and that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- The following tests ensure that the system is operable during the operating cycle:
  - SR 3.1.7.7 which verifies system capacity.
  - SR 3.1.7.2 and 3.1.7.3 which ensure that the temperature in the SLC system tank and SLC pump suction piping is maintained to prevent precipitation of sodium pentaborate.
  - SR 3.1.7.4 which verifies the continuity of the charge in the explosive valves.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

TS 3.1.8 Scram Discharge Volume Vent and Drain Valves

SR 3.1.8.3

This SR ensures that the scram discharge volume vent and drain valves close in $\leq$ 30 seconds after receipt of an actual or simulated scram signal and open when the actual or simulated scram signal is reset.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency will be small:

- The licensee reviewed historical maintenance and surveillance data which shows that these tests normally pass at the current frequency and that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- The following test ensures that the system is operable during the operating cycle. SR 3.1.8.2 requires that the scram discharge volume vent and drain valves be cycled fully closed and fully open every 92 days during the operating cycle. Although this test does not ensure that the logic of the SDV vent and drain valves is operable, logic systems are inherently more reliable and, therefore, the impact of the increased surveillance interval is small.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

TS 3.4.2 Flow Control Valves

SR 3.4.2.1 and 3.4.2.2

These SRs ensure that flow control valves fail "as is" on loss of hydraulic pressure at the hydraulic control unit and that the average rate of flow control valve (FCV) movement is within the specific limit of 11% of stroke per second.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- The FCVs are utilized during normal plant operation and major deviations will be identified.
- The licensee's analysis has shown that, given a LOCA event, no single failure in the electronic/hydraulic controls can cause the FCV to close while in the normal manual control mode.
- Backup electronic velocity limiters are included in the recirculation control system to limit FCV velocity to 11%. Additional multiple specific component failures in these limiters must occur to cause the full closure of the FCV at velocities in excess of this value.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

TS 3.4.7 Reactor Coolant System Leakage Detection Instrumentation

SR 3.4.7.3

NRC This is an instrument covered by an LE DOC. Should it be in this Section since the title is "Non Instrumentation changes"

These SRs ensure that the required primary containment atmosphere particulate, atmospheric gaseous, floor drain sump flow, and air cooler condensate flow rate monitoring systems are operable and within the established calibration requirements.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- These systems do not provide for actuation of any safety devices and provide a monitoring function only. In addition, the setpoint of these devices is not an assumption in any event analysis.
- These systems provide redundant detection methods.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

ITS 3.5 ECCS

SR 3.5.1.6

This SR ensures that a system initiation signal (actual or simulated) to the automatic initiation logic of HPCS, LPCS, and LPCI will cause the subsystems to operate as designed, including actuation of the system throughout its emergency operation sequence, automatic pump startup and actuation of all automatic valves to their required positions.

SR 3.5.1.9

~~This SR ensures that each ECCS injection/spray subsystem responds in a manner consistent with the values assumed in the accident analysis. (This test applies to Modes 1, 2, and 3)~~

SR 3.5.2.7

~~This SR ensures that each ECCS injection/spray subsystem responds in a manner consistent with the values assumed in the accident analysis. (This test applies to Modes 4 and 5)~~

SR 3.5.1.7

This SR ensures that the mechanical portions of the Automatic Depressurization System (ADS) function as designed when initiated either by an actual or simulated initiation signal.

SR 3.5.1.8

This SR ensures that the ADS valves and solenoids operate properly.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- The ECCS network has built-in redundancy so that no single failure will prevent the starting of the ECCS system.
- ADS is equipped with two redundant trip systems.
- Other, more frequent tests will detect significant failures in the ECCS subsystems to perform their safety function. For example: ~~each~~ of the ECCS injection/spray systems are tested every three months according to the ASME Section XI inservice testing program, and surveillances are performed every 31 days to ensure that the subsystems are available to perform their safety function.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed changes is small and, therefore, the changes are acceptable.

TS 3.5.3 RCIC System

SR 3.5.3.4

This SR ensures that the RCIC system is capable of performing its design function ~~before reactor pressure is increased above the system minimum operating pressure~~. at approximately the system minimum required pressure

SR 3.5.3.5

This SR ensures that a system initiation signal (actual or simulated) to the automatic initiation logic of RCIC will cause the systems or subsystems to operate as designed, including actuation of the system throughout its emergency operating sequence, automatic pump startup and actuation of all automatic valves to their required positions.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- The safety analysis does not take credit for the RCIC system.
- The functions performed by RCIC are redundant to those performed by HPCS.

- RCIC will continue to be tested every three months to ensure required flow at normal operating pressure. This test would detect significant failures of the RCIC turbine or pump that could lead to the failure of the system to perform its safety function at low pressures.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed changes is small and, therefore, the changes are acceptable.

<u>TS 3.6.1.1</u> <u>Primary Containment</u>

<u>SR 3.6.1.1.3</u>

This SR ensures that the drywell-to-suppression chamber bypass leakage is less than or equal to the bypass leakage limit.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for the above surveillance will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- The risk of high radiation exposure requires that this surveillance be performed during shutdown.
- Tests are performed in accordance with the Primary Containment Leakage Rate Testing Program that would identify most component failures.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

<u>TS 3.6.1.3</u> <u>Primary Containment Isolation Valves (PCIV)</u>

.3 <u>SR 3.6.1.7</u>

This SR ensures that each automatic PCIV will actuate to its isolation position on a primary containment isolation signal.

<u>SR 3.6.1.3.8</u>

This SR ensures that each excess flow check valve (EFCV) actuates to the isolation position on an actual or simulated instrument line break condition.

<u>SR 3.6.1.3.9</u>

This SR requires that the explosive squib ~~from~~ be removed and tested for the shear isolation valve of the Traversing Incore Probe System.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

or, in accordance with the IST program, justifications exist to document less frequent testing

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- During the operating cycle, the PCIVs are either exercised or partially stroked. These exercises test a significant portion of the PCIV's circuitry and will detect failures of the circuitry or failures with valve movement.
- The PCIVs, including the actuating logic, are designed to be single failure proof and are, therefore, highly reliable.
- The EFCVs are required to be tested under the conditions that apply during a plant outage. In addition, the potential for an unplanned transient increases if the surveillance were performed with the reactor at power.
- The instrument lines associated with the EFCVs are provided with flow-restricting orifices which are sized to ensure that in the event of a postulated failure of the piping or component, the potential offsite exposure would be substantially below the guidelines of 10 CFR 100.
- The TIP shear isolation valve explosive charge is also verified on a monthly basis by the requirement of TS 3.6.1.3.4. In addition, administrative controls on the explosive charges, such as limits on shelf life and operating life, provide further assurance that the explosive squibs will operate as designed.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed changes is small and, therefore, the changes are acceptable.

<u>TS 3.6.1.6</u> <u>Suppression Chamber to Drywell Vacuum Breakers</u>

<u>SR 3.6.1.6.3</u>

This SR verifies that the opening setpoint of each suppression chamber-to-drywell vacuum breaker is less than or equal to the specified differential pressure.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- This surveillance must be performed under the conditions that apply during a plant outage.
- The potential for an unplanned transient is increased if the surveillance were performed with the reactor at power.
- Other surveillances, such as a functional test of each vacuum breaker every 92 days and verification that each breaker is closed every 14 days, provide additional assurance that the breakers would function as designed.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed changes is small and, therefore, the change is acceptable.

TS 3.6.3.1 Primary Containment Hydrogen Recombiners

SR 3.6.3.1.1

This SR verifies the ability of the recombiner system to actuate and prevent the hydrogen-oxygen level within the primary containment from reaching the flammability limit.

SR 3.6.3.1.2

(fon) This SR ensures that there are not detectable grounds in any heater phase by verifying that the resistance to ground fro any heater phase is greater than the required resistance value when this SR is performed following performance of the system functional test.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- Redundancy of the recombiner system and the availability of alternate hydrogen control system.
- The backup Hydrogen Purge System also functions in conjunction with the hydrogen recombiner and can filter purged air from the primary containment, post-LOCA, after the containment pressure has dropped below a predetermined value.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

TS 3.6.4.1 Secondary Containment

These SRs ensure secondary containment boundary integrity by demonstrating that secondary containment vacuum assumed in the safety analysis can be established and maintained under design basis conditions.

SR 3.6.4.1.3

This SR verifies the secondary containment can be drawn down to the specified vacuum in the time required using one standby gas treatment subsystem.

SR 3.6.4.1.~~5~~ 4

This SR verifies the secondary containment can be maintained at the specified vacuum for the required time using one SGT subsystem at the specified flow rate.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- Secondary containment is maintained at a negative pressure during normal operations.
- Secondary containment structural integrity is maintained through administrative controls which ensure that no significant changes will be made to the secondary containment structure without proper evaluation. Any event which would cause significant structural degradation, such as a seismic event, would require a plant evaluation.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

<u>TS 3.6.4.2</u> <u>Secondary Containment Isolation Valves (SCIVs)</u>

<u>SR 3.6.4.2.3</u>

This SR verifies each automatic secondary containment isolation valve actuates to the isolation position on an actual or simulated automatic isolation signal.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- These valves are also tested every 92 days to satisfy the requirements of SR 3.6.4.2.2 which verifies isolation times are within limits. These tests would detect significant failures affecting valve operation.
- The SCIV system active components and power supplies are designed with redundancy to meet the single active failure criteria.
- Industry reliability studies show that the overall safety systems' reliabilities are not dominated by the reliabilities of the logic system, but by that of the mechanical components which are tested on a more frequent basis.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

<u>TS 3.6.4.3</u> <u>Standby Gas Treatment (SGT) System</u>

<u>SR 3.6.4.3.3</u>

This SR verifies that each SGT subsystem actuates on an actual or simulated initiation signal.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- The system is operated every 31 days to satisfy the requirements of SR 3.6.4.3.1, which operates each SGT subsystem for a specified period of time, ensures that both subsystems are operable and that all associated controls are functioning properly. This test will detect significant failures affecting system operation.
- The SGT system is designed with redundancy to meet the single active failure criteria.
- Industry reliability studies show that the overall safety systems' reliabilities are not dominated by the reliabilities of the logic system, but by that of the mechanical components which are tested on a more frequent basis.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

TS 3.7.2 Diesel Generator Cooling Water (DGCW) System C

SR 3.7.2.2

This SR verifies that each DGCW pump starts automatically on each required actual or simulated initiation signal.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- This requirement is also verified on a more frequent basis by the following tests: (1) diesel generator start testing every 31 days per TS 3.8.1.2, and (2) Low Pressure Coolant Spray pump start testing every 92 days for the Inservice Testing Program.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

TS 3.7.3 Ultimate Heat Sink

SR 3.7.3.2 and 3.7.3.3

These SRs verify the sediment deposition and bottom elevation of the cooling pond. They ensure that the volume of water in the CSCS pond will be adequate to support long term cooling for a 30 day period after a design basis accident.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.

- A hydrographic survey of the pond was performed in 1999 which showed that the amount of sediment that accumulated from the time of original licensing to the survey date (over 17 years) was negligible.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

TS 3.7.4 Control Room Area Filtration System

SR 3.7.4.4 and 3.7.4.5

These SRS ensure that each CRAF subsystem is capable of automatic initiation and that the mechanical components operate as designed on system actuation and that the control room area boundary leakage is within the capacity of the CRAF system by demonstrating that control room area can be maintained at a positive pressure with respect to adjacent areas when in the pressurization mode of operation.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- The control room boundary is maintained at a positive pressure during normal operation. Therefore, any substantial degradation of the boundary that would prevent maintaining the control room area at the required pressure will be evident.
- The CRAF system will be tested every 31 days by SR 3.7.4.1 and SR 3.7.4.2 which will detect any significant mechanical component failures and verify the operability of the majority of the CRAF system circuitry.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

TS 3.7.7 Main Turbine Bypass System

SR 3.7.7.2 and 3.7.7.3

These SRS ensure that the Main Turbine Bypass System will function with the required response as assumed in the transient analysis such as the turbine generator load rejection and feedwater transients in order to mitigate the increase in reactor vessel pressure.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- The main turbine bypass logic which is being tested is part of the Main Turbine Control System which is in continuous operation at power and most malfunctions that would

impact the main turbine bypass system would also impact the main turbine control system and be readily apparent during plant operation.
- The weekly test of the turbine bypass valves (SR 3.7.7.1) will also detect problems since the test uses a fast open signal for the last 10% of valve travel.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

TS 5.5 Programs and Manuals NRC <missing 3.8 LD descriptions>

SR 5.5.2.b

This SR establishes a program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- Most portions of the subject systems included in this program are visually walked down during plant testing, and/or operator/system engineer walkdowns which would detect gross leakage.
- Plant radiological surveys will identify any potential sources of leakage.

SR 5.5.8

This SR ensures that the standby gas treatment (SGT) system and control room area filtration (CRAF) system inplace charcoal adsorbers, HEPA filters, and heaters perform their safety function.

The licensee provided the following justification for concluding that the effect on safety due to the extended surveillance frequency for each of the above surveillances will be small:

- The licensee reviewed historical surveillance data which shows that no failures have occurred that would invalidate the conclusion that the impact, if any, on system availability is small due to this change.
- ITS 5.5.8 also requires in-place filter and charcoal adsorber testing and filter pressure drop testing after any structural maintenance on the HEPA filter or charcoal adsorber housings or following painting, fire, or chemical release in any ventilation zone communicating with the systems. These tests would detect potential changes in HEPA filter efficiency, carbon adsorber bypass leakage, or filter pressure drop.
- The SGT and CRAF system active components and power supplies are designed with redundancy to meet the single active failure criteria.

Based on the information above, the staff concludes that the impact on plant safety due to the proposed change is small and, therefore, the change is acceptable.

Additional TS Changes and Beyond-Scope Items

<<<To be provided later.>>>

IV. STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

V. ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an Environmental Assessment and Finding of No Significant Impact was published in the *Federal Register* **date on date (citation).** Accordingly, based upon the environmental assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

VI. CONCLUSION

NUREG - 1433 and

The LaSalle ITS provide clearer, more readily understandable requirements to ensure safe operation of the plant. The NRC staff concludes that they satisfy the guidance in the Commission's policy statement with regard to the content of TS and conform to the model provided in NUREG-1434 with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the LaSalle ITS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36, and other applicable standards. On this basis, the NRC staff concludes that the proposed LaSalle ITS are acceptable.

The NRC staff has also reviewed the plant-specific changes to CTS as described in this evaluation. On the basis of the evaluations described herein for each of the changes, the NRC staff concludes that these changes are acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and, (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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CTS Discussion of Change Tables

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 1.0 - USE AND APPLICATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	1.1	1.0, 4.1.1.c
A.2	The definitions of E-AVERAGE DISINTEGRATION ENERGY, FRACTION OF RATED THERMAL POWER, GASEOUS RADWASTE TREATMENT SYSTEM, LIMITING CONTROL ROD PATTERN, MEMBER(S) OF THE PUBLIC, PHYSICS TESTS, PURGE-PURGING, REPORTABLE EVENT, ROD DENSITY, SITE BOUNDARY, SOURCE CHECK, VENTILATION EXHAUST TREATMENT SYSTEM, and VENTING are deleted since specific Specifications referring to them no longer contain their use, or no longer are retained in the LaSalle 1 and 2 ITS.	N/A	1.11, 1.15, 1.17, 1.21, 1.25, 1.30, 1.34, 1.37, 1.38, 1.41, 1.42, 1.47, 1.48
A.3	Revises the wording for the definitions of CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST to more accurately reflect the intent for OPERABILITY of a channel; i.e., not all channels will have a "required" sensor, alarm, or channel failure trip function, and conversely, some channels may have a "required" display or interlock function. Also, combining the separate definition/requirement for analog and bistable channels, and the phrase "or actual," in reference to the injected signal for the CHANNEL FUNCTIONAL TEST, has been added as an explicit option to the currently required simulated signal.	1.1 CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST definitions	1.4, 1.6, 1.23
A.4	Not used.	N/A	N/A
A.5	Incorporates the current definition of CRITICAL POWER RATIO into the proposed definition of MINIMUM CRITICAL POWER RATIO.	1.1 MINIMUM CRITICAL POWER RATIO	1.9
A.6	Modifies the definition of EOC-RPT RESPONSE TIME to include arc suppression time, consistent with CTS 4.3.4.2.3.	1.1 EOC-RPT RESPONSE TIME	1.13
A.7	Deletes the definition of FREQUENCY NOTATION since the abbreviations in Table 1.1 are no longer used; SR Frequencies in the LaSalle 1 and 2 ITS are directly specified.	N/A	1.16, Table 1.1

A.8	Combines the current definitions for IDENTIFIED LEAKAGE, PRESSURE BOUNDARY LEAKAGE, and UNIDENTIFIED LEAKAGE into one proposed defined term: LEAKAGE.	1.1 LEAKAGE definition	1.18, 1.31, 1.46
A.9	Provides clarifications: 1) as specified in the second portion of the current definition of IDENTIFIED LEAKAGE (proposed LEAKAGE definition), the intended leakage is that which occurs into the drywell space (i.e., containment atmosphere); and 2) the "collection systems" specified in the first portion of the definitions are intended to be those for collection of leakages into the drywell space.	1.1 LEAKAGE definition	1.18
A.10	Modifies the ISOLATION SYSTEM RESPONSE TIME definition to not include diesel generator starting and loading times, since they are redundant to the diesel generator Surveillance Requirements in CTS 3.8.1.1.	1.1 ISOLATION SYSTEM RESPONSE TIME definition	1.19
A.11	Modifies the definition of LOGIC SYSTEM FUNCTIONAL TEST (LSFT) to exclude the actuated device; the actuated device is to be tested as part of a system functional test.	1.1 LOGIC SYSTEM FUNCTIONAL TEST	1.23
A.12	Moves the definition of OFFSITE DOSE CALCULATION MANUAL to ITS 5.5.1.	5.5.1	1.27
A.13	Modifies the definition of OPERABILITY to only require a normal (offsite) or emergency (onsite) power source. Currently, when one source is not available, the definition of OPERABILITY alone requires the supported features to be declared inoperable. However, CTS LCO 3.0.5 allows the features to be considered OPERABLE provided at least one source of power is still available and their redundant features are OPERABLE. CTS LCO 3.0.5 requirements are incorporated into ITS LCO 3.8.1 ACTIONS for when a diesel or offsite power source is inoperable. Also, "specified function" is changed to "specified safety function(s)."	1.1 OPERABLE-OPERABILITY definition	1.28
A.14	Replaces OPERATIONAL CONDITION-CONDITION with the ITS definition of MODE. Clarifying statements are added to indicate that defined MODES in ITS Table 1.1-1 apply only when fuel is in the reactor vessel and that reactor vessel head closure bolt tensioning is a parameter.	1.1 MODE definition	1.29

A.15	Deletes the definitions of PRIMARY CONTAINMENT INTEGRITY and SECONDARY CONTAINMENT; all the requirements are specifically addressed in the LCOs for the Primary Containment and Secondary Containment, along with the remainder of the LCOs in the Containment Systems Section.	N/A	1.32, 1.39
A.16	Moves the definition of PROCESS CONTROL PROGRAM to the Administrative Controls Chapter (Chapter 5.0).	5.0	1.33
A.17	Modifies the definition of SHUTDOWN MARGIN to address stuck control rods, consistent with the LaSalle 1 and 2 CTS requirement found in CTS 4.1.1.c to account for the worth of a stuck control rod.	1.1 SHUTDOWN MARGIN definition	1.40, 4.1.1.c
A.18	Modifies the definition of STAGGERED TEST BASIS, allowing the minimum Surveillance interval to be specified in the Surveillance Requirements' Frequency column of the applicable LCOs, independent of the number of subsystems.	1.1 STAGGERED TEST BASIS definition	1.43
A.19	The intent of applying the MODE definition only when fuel is in the vessel, as specified in CTS Table 1.2, footnote *, has been moved to the definition of MODE. In addition, since the vessel head can only be removed if the head closure bolts are less than fully tensioned, there is no purpose in including "or with the head removed."	1.1 MODE definition	Table 1.2 footnote *
A.20	Moves CTS Table 1.2, footnotes #, ##, and *** to LCO requirements in the Special Operations Section.	3.10.1, 3.10.2, 3.10.3	Table 1.2 footnotes #, ##, ***
A.21	Deletes CTS Table 1.2, footnote **, which references Special Test Exception 3.10.3.	N/A	Table 1.2 footnote **
A.22	Adds Sections 1.2, Logical Connector, 1.3, Completion Times, and 1.4 Frequency, to the Technical Specifications to aid in the understanding and use of the new format and presentation style, and to establish positions not previously formalized.	1.2, 1.3, 1.4	N/A

A.23	The definitions of ECCS RESPONSE TIME, ISOLATION SYSTEM RESPONSE TIME, and RPS RESPONSE TIME have been modified with an allowance to not measure the response times of certain components, provided that the components and methods for verification have been prveiously reviewed and approved by the NRC. space ECCS RESPONSE TIME, ISOLATION SYSTEM RESPONSE TIME, and RPS RESPONSE TIME	1.1 ~~CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST and LOGIC SYSTEM FUNCTIONAL TEST~~ definitions	Table 3.3.1-2 footnote ##, Table 3.3.3-3 footnote #, Table 3.3.2-3 footnote ##
A.24	For CTS Table 3.3.1-1 Functional Unit 9 and CTS Table 3.3.4.2-1 Trip Function 1, Turbine Stop Valve – Closure, the response time of the limit switch is not measured since it is not practical. A test switch in parallel with the limit switch is used to simulate the limit switch function, and the response time downstream of the test switch is measured. Therefore, the definitions of RPS RESPONSE TIME and EOC-RPT RESPONSE TIME have been modified to not require a measurement to be performed for these components. SYSTEM	1.1 ECCS RESPONSE TIME and EOC-RPT RESPONSE TIME definitions	Table 3.3.1-1 Functional Unit 9, ~~and~~ Table 3.3.4.2-1 Trip Function 1

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised wording.	2.0	2.0
A.2	Moves requirements for the Limiting Safety System Settings to ITS Section 3.3.	3.3	2.2
A.3	Deletes the details contained in the Actions of CTS 2.1.1, 2.1.2, 2.1.3, and 2.1.4 to comply with the requirements of Specification 6.4, since the ITS format does not include providing cross references. In addition, the reference to Specification 6.4 has been deleted since Specification 6.4 has been deleted from the Technical Specifications.	N/A	2.1.1, 2.1.2, 2.1.3, 2.1.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	3.0	3.0, 4.0
A.2	Renumber the CTS 3.0 series to LCO 3.0.X and the CTS 4.0 series to SR 3.0.X.	3.0	3.0, 4.0
A.3	1) Replaces the phrase "Compliance with...is required" with the phrase "LCOs shall be met;" 2) Changes "OPERATIONAL CONDITIONS" to "MODES;" 3) Changes "conditions specified therein" to "specified conditions in the Applicability;" and 4) Changes the phrase "that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specification 3.0.6" to "as provided in LCO 3.0.2 and LCO 3.0.7." (LCO 3.0.2 addresses the requirement of meeting the associated ACTIONS when not meeting a Limiting Condition for Operation. LCO 3.0.7 addresses another situation when an LCO requirement is allowed not to be met.)	LCO 3.0.1	3.0.1
A.4	1) Replaces the lead-in sentence "Noncompliance with a Specification shall exist when..." with "Upon discovery of a failure to meet an LCO..."; 2) Changes the phrase "restored" to "met or is no longer applicable;" 3) Changes "time intervals" to "Completion Time(s);" 4) Changes "ACTION requirements" to "Required Action(s);" 5) Adds exception to LCO 3.0.6 due to its inclusion in the LaSalle 1 and 2 ITS; and 6) Adds the phrase "unless otherwise stated" consistent with current LaSalle 1 and 2 TS exceptions found in a few LCOs to avoid potential misapplication of those requirements.	LCO 3.0.2	3.0.2

A.5	1) Replaces the phrase "except as provided in the associated ACTION requirements" with "and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS" to cover all potential possibilities that require entry into LCO 3.0.3; 2) Changes "OPERATIONAL CONDITION" to "MODE or other specified condition;" 3) Revises the times to reach each MODE to include the 1 hour allowed by CTS 3.0.3 for initiating the shutdown. Also, the time represents the total time allowed from the entry into LCO 3.0.3, replacing the current presentation where each time is referenced as "the next," or "the following," or "the subsequent;" 4) Changes the phrase "under the ACTION requirements...failure to meet the Limiting Condition for Operation" to "in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required," to specifically state that LCO 3.0.3 actions do not have to be completed; and 5) Changes "This specification is not applicable in OPERATIONAL CONDITION 4 or 5" to "LCO 3.0.3 is only applicable in MODES 1, 2, and 3."	LCO 3.0.3	3.0.3
A.6	1) Changes the phrase "Entry into an OPERATIONAL CONDITION or other specified CONDITION" to "When an LCO is not met, entry into a MODE or other specified condition in the Applicability..."; 2) Rewords "This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements"to "This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit;" 3) Condenses the phrase "when the conditions for the Limiting Conditions for Operations are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION may be made in accordance with the ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time" to "except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;" 4) Changes "Exceptions to these requirements are stated in the individual Specifications" to "Exceptions to this Specification are stated ~~in~~ the individual Specifications;" and 5) Adds the sentence "LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3."	LCO 3.0.4	3.0.4
A.7	Moves the technical content of CTS 3.0.5 to ITS 3.8.1.	3.8.1	3.0.5

A.8	ITS LCO 3.0.6 is added to provide guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)).	LCO 3.0.6	N/A
A.9	ITS LCO 3.0.7 is added to provide guidance regarding the meeting of Special Operations LCOs in Section 3.10.	LCO 3.0.7	N/A
A.10	ITS SR 3.0.1 is constructed to more completely present the relationship between Surveillance Requirements and meeting the requirements of the LCO. The second sentence of ITS SR 3.0.1, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO," is proposed to clarify existing intent that is not explicitly stated. The concept (editorially rewritten) found in the first sentence of CTS 4.0.3, has been moved to the third sentence of ITS SR 3.0.1; "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO, except as provided in SR 3.0.3." The sentence "Surveillance Requirements do not have to be performed on inoperable equipment" is moved from the last sentence of CTS 4.0.3, to ITS SR 3.0.1. Since all LCOs do not deal exclusively with equipment OPERABILITY, a clarifying phrase is also added: "or variables outside specified limits."	SR 3.0.1	4.0.1, 4.0.3
A.11	"The specified Frequency for each Surveillance Requirement is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met," was added to clearly establish what constituted meeting the specified Frequency of each Surveillance Requirement. Also, the sentence "Exceptions to this Specification are stated in the individual Specifications" is added to acknowledge the explicit use of exceptions in various Surveillances.	SR 3.0.2	4.0.2
A.12	1) Changes "Entry into an OPERATIONAL CONDITION or other specified applicable CONDITION" to "Entry into a MODE or other specified condition in the Applicability of an LCO."; 2) Rewords "...passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements" to "entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit"; and 3) Adds the sentence "SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3."	SR 3.0.4	4.0.4
A.13	Moves the technical content of CTS 4.0.5 to ITS 5.5.7.	5.5.7	4.0.5

A.14	ITS LCO 3.0.8 and ITS SR 3.0.5 have been added to reflect the use of the LCOs and SRs for dual unit sites.	LCO 3.0.8, SR 3.0.5	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.1	3/4.1.1
A.2	Changes the passive CTS 3.1.1 Action b words of "verify...inserted," to the active ITS 3.1.1 Required Actions C.1 and D.1 "Initiate action to insert...".	3.1.1 Required Actions C.1 and D.1	3.1.1 Action b
A.3	Deletes redundant actions of CTS 3.1.1 Actions b and c, which require suspension of activities that could reduce the SDM, when the SDM is not within limits in MODES 3, 4, or 5. In MODES 3 and 4, the vessel head is bolted in place, and the only activity that can significantly reduce SHUTDOWN MARGIN (SDM) is control rod withdrawal, for which a Required Action that ensures control rods remain inserted is provided. In MODE 5, the only activities that can affect SDM are CORE ALTERATIONS and control rod withdrawal, for which Required Actions are provided to suspend CORE ALTERATIONS and ensure control rods remain inserted.	N/A	3.1.1 Actions b and c
A.4	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible).	3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5	3.1.1 Actions b and c
A.5	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.1.1 Required Actions D.2, D.3, D.4, E.3, E.4, and E.5	3.1.1 Actions b and c
A.6	Not used.	N/A	N/A
A.7	Enhances presentation by requiring actions to be immediately initiated to insert all required control rods (completing the actions as soon as possible) in lieu of current requirement to insert the required control rods in 8 hours (initiating the actions as soon as possible).	3.1.1 Required Action E.2	3.1.1 Action c

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	A specific completion time for the SDM test is proposed to clarify <u>when</u> "prior to or during the first startup" applies. Most SDM tests are performed as an in-sequence critical and, therefore, 4 hours after reaching criticality is provided in ITS SR 3.1.1.1 as a reasonable time to perform the required calculations and have appropriate verification completed.	SR 3.1.1.1	4.1.1.a
A.9	Replaces the activity referred to as "refueling" with "fuel movement within the reactor pressure vessel or control rod replacement," since the intent of the Surveillance Requirement is to perform the SDM test after in-vessel activities which could have altered SDM.	SR 3.1.1.1	4.1.1.a
A.10	Moves the CTS 4.1.1.c requirement to perform an SDM test after finding a stuck control rod to ITS 3.1.3.	3.1.3	4.1.1.c
	3.1.2, Reactivity Anomalies		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.2	3/4.1.2
A.2	Changes "reactivity equivalence of the difference" to "reactivity difference."	LCO 3.1.2, SR 3.1.2.1	3.1.2, 4.1.2
A.3	Adds a specific time for completing the reactivity anomaly surveillance to clarify <u>when</u> "during the first startup" the test must be performed. This test is performed by comparing the difference between the actual critical control rod configuration to the predicted critical control rod configuration as a function of cycle exposure while at steady state reactor power conditions. Therefore, "24 hours after reaching these conditions" is provided as a reasonable time to perform the required calculations and complete the appropriate verification, meeting the intent of the CTS.	SR 3.1.2.1	4.1.2.a
	3.1.3, Control Rod OPERABILITY		

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TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	3.1.3	3/4.1.3.1, 4.1.1.c, 3/4.1.3.2, 3/4.1.3.6, 3/4.1.3.7
A.2	Reorganized the Control Rod OPERABILITY Specification to include all conditions that can affect the ability of the control rods to provide the necessary reactivity insertion.	3.1.3	3.1.3.1
A.3	Adds a Note, "Separate Condition entry is allowed for each control rod," which is consistent with the intent of the CTS.	3.1.3 ACTIONS Note	3.1.3.1 Actions
A.4	Adds a Note that allows for bypassing the RWM, if needed for continued operations. This note is informative in that the RWM may be bypassed at any time, provided the proper ACTIONS of CTS 3.1.4.1 (ITS 3.3.2.1), the RWM Specification, are taken.	3.1.3 Required Actions A.1 and C.1	N/A
A.5	Replaces "being immovable, as a result of excessive friction or mechanical interference, or known to be untrippable" with the term "stuck," since details of potential mechanisms by which control rods may be stuck are not necessary for inclusion within the Condition.	3.1.3 Condition A	3.1.3.1 Action a, 4.1.1.c
A.6	Numerous footnotes, which permit the directional control valves to be rearmed intermittently, have been deleted since ITS LCO 3.0.5 provides this allowance.	LCO 3.0.5	3.1.3.1 Actions a.1.b), b.1.b), and b.2.a) footnote *, 3.1.3.6 Action a.1.b) footnote **, 3.1.3.7 Action a.3.b) footnote **
A.7	Moves the SDV vent and drain valves requirements to ITS 3.1.8.	3.1.8	3.1.3.1 Actions d and e, 4.1.3.1.1, 4.1.3.1.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.8	Deletes redundant phrase exempting SR on inoperable control rods since inoperable control rods are already not required to meet this Surveillance (per CTS 4.0.3).	SR 3.0.1	4.1.3.1.2
A.9	Surveillance that "cross-references" other Surveillances is deleted since the listed Surveillances are required by other Specifications.	N/A	4.1.3.1.3
A.10	Moves the SDM allowance to the definition of SDM.	1.1 SHUTDOWN MARGIN definition	4.1.1.c
A.11	Presents the requirement that maximum control rod scram insertion time be ≤ 7 seconds in SR 3.1.3.4, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification.	SR 3.1.4.1	LCO 3.1.3.2
A.12	Deletes the definition of time zero since it is duplicative of the definition of time zero in other CTS and maintained in footnote (a) to ITS Table 3.1.4-1.	Table 3.1.4-1 footnote (a)	LCO 3.1.3.2
A.13	Adds new SR to require SRs in ITS 3.1.4 to be performed, since CTS 4.1.3.2, which provides the scram time testing requirements, is addressed in ITS 3.1.4.	SR 3.1.3.4	4.1.3.2
A.14	Presents the requirement that control rods be coupled to their drive mechanism in SR 3.1.3.5, making it a requirement for control rods to be considered OPERABLE, in lieu of an individual Specification.	SR 3.1.3.5	LCO 3.1.3.6
A.15	Deletes CTS 3.1.3.6 Action a.1.a), which specifies the method of restoring coupling integrity to an uncoupled control rod. ITS does not explicitly detail options to "restore...to OPERABLE." This action is always an option, and is implied in the ITS ACTIONS.	LCO 3.0.2	3.1.3.6 Action a.1.a)
A.16	CTS 4.1.3.6.a, "CORE ALTERATIONS that could have affected the control rod drive coupling integrity" is a subset of CTS 4.1.3.6.c, which is incorporated in ITS SR 3.1.3.5 (performance of the integrity verification prior to control rod OPERABILITY).	SR 3.1.3.5	4.1.3.6.a
A.17	The separate Specification for control rod position is captured by the requirement that each control rod have at least one control rod position indication in SR 3.1.3.1.	SR 3.1.3.1	LCO 3.1.3.7

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.18	Moves the requirements for control rod position indication during MODE 5 (refueling) to ITS 3.9.4.	3.9.4	3/4.1.3.7
A.19	Covers the requirements of CTS 3.1.3.7 Action a.3.(a)2) by the Note to ITS 3.1.3 Required Action C.1, which states, in part, that RWM may be bypassed as allowed by ITS LCO 3.3.2.1. LCO 3.3.2.1 provides the requirements of CTS 3.1.3.7 Action a.3.(a)2).	3.1.3 Required Action C.1 Note	3.1.3.7 Action a.3.(a)2)
	3.1.4, Control Rod Scram Times		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.4	4.1.3.2, 3/4.1.3.3, 3/4.1.3.4
	3.1.5, Control Rod Scram Accumulators		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.5	3/4.1.3.5
A.2	Moves the control rod scram accumulator OPERABILITY MODE 5 requirements to ITS 3.9.5 and ITS 3.10.7.	3.9.5, 3.10.7	3/4.1.3.5
A.3	Adds ITS Note, "Separate Condition entry is allowed for each control rod scram accumulator," which is consistent with the intent of the CTS.	3.1.5 ACTIONS Note	3.1.3.5
A.4	The revised presentation of CTS 3.1.3.5 Action a.1.a)1) does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.1.3.5 Action a.1.a)1)
A.5	Deletes the "default" action "Otherwise, be in at least HOT SHUTDOWN within the next 12 hours" as there are no circumstances which preclude the possibility of compliance with an ACTION to "Declare the control rod...inoperable."	N/A	3.1.3.5 Action a.1.b)

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.6	The method for verifying that a control rod drive pump is operating has been changed from inserting one control rod one notch by drive water pressure within the normal operating range to verifying that charging water header pressure is at least 940 psig. The proposed method for determining charging water header pressure provides added assurance that the charging water pressure is sufficient to insert all control rods, whereas the existing method only assures that one rod can be inserted.	3.1.5 ACTIONS B and C	3.1.3.5 Action a.,2.a) space
A.7	CTS 3.1.3.5 Action a.2.b) is redundant to the Actions of CTS 3.1.3.1(ITS 3.1.3), and has therefore been deleted. space	3.1.3 ACTIONS	3.1.3.5 Action a.2.b)
A.8	Deletes the conditions which specify when the accumulator Surveillance does not have to be performed (i.e., when the associated control rod is inserted and disarmed or scrammed), since ITS LCO 3.0.1 provides the allowance.	LCO 3.0.1	4.1.3.5.a
	3.1.6, Rod Pattern Control		
NONE	NONE	NONE	NONE
	3.1.7, Standby Liquid Control System		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.7	3/4.1.5
A.2	Clarifies, for the requirement that the indicated temperature be greater than or equal to 60 degrees F, that the temperature is "the suction piping up to the tank outlet valve."	SR 3.1.7.3	4.1.5.a.2
A.3	Adds "or can be aligned to the correct position" in SR 3.1.7.6 to clarify that it is permissible for the SLC systems' valves to be in the non-accident position and still be considered OPERABLE.	SR 3.1.7.6	4.1.5.b.4
A.4	Rewords the SR that verifies the heat traced piping is unblocked to identify the extent of the system heat traced piping.	SR 3.1.7.9	4.1.5.c.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Changes the Frequency of verification that the heat traced piping is unblocked such that the Surveillance is required if the piping temperature drops below the lower limit rather than whenever the heat tracing circuit has been found to be inoperable, making the SR apply when meaningful.	SR 3.1.7.9	4.1.5.c.4 footnote **
A.6	Deletes the CTS allowance to perform the test by any series of sequential, overlapping or total flow path steps such that the entire flow path is included, since the test can only be performed in one step; by pumping from the storage tank to the test tank.	N/A	4.1.5.c.4 footnote **
A.7	Changed the term "motor operated suction valve" to "storage tank outlet valve," consistent with current plant terminology.	SR 3.1.7.9	4.1.5.c.4
	3.1.8, SDV Vent and Drain Valves		
A.1	Editorial changes, reformatting, and revised numbering.	3.1.8	3/4.1.3.1
A.2	Adds an LCO and Applicability statement for the scram discharge volume (SDV) vent and drain valve requirements, explicitly stating existing OPERABILITY requirements.	LCO 3.1.8	3.1.3.1
A.3	Clarifies that the signal used for performing CTS 4.1.3.1.4.a and 4.1.3.1.4.b can be an "actual or simulated" signal.	SR 3.1.8.3	N/A
	Current Specification 3/4.1.3.8, Control Rod Drive Housing Support		
NONE	NONE	NONE	NONE
	Current Specification 3/4.1.6, Economic Generation Control System		
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE		
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.1	3/4.2.1
A.2	Deletes "OPERATIONAL CONDITION 1" from the Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.2.1
	3.2.2, MINIMUM CRITICAL POWER RATIO		
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.2	3/4.2.3
A.2	Deletes "OPERATIONAL CONDITION 1" from the Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.2.3
	3.2.3, LINEAR HEAT GENERATION RATE		
A.1	Editorial changes, reformatting, and revised renumbering.	3.2.3	3/4.2.4
A.2	Deletes "OPERATIONAL CONDITION 1" from the Applicability of "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.2.4

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.1.1	3/4.3.1, 2.2
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel" and revises the wording for CTS Action a and CTS Action b ("One or more required channels" and "One or more Functions"), which is consistent with the intent of the CTS.	3.3.1.1 ACTIONS Note 1, 3.3.1.1 ACTIONS A, B, and C	3.3.1 Actions
A.3	The response time for some of the RPS Functions are not assumed in any accident analysis, thus their response time is listed as "N/A" (i.e., not applicable) in CTS Table 3.3.1-2. Therefore, the response time tests for these Functions have been deleted by not including the response time SR to Functions that have N/A notes in the Table. In addition, CTS Table 3.3.1-2 footnote ## provides an allowance to exclude the sensor for the Reactor Vessel Steam Dome Pressure – High and Reactor Vessel Water Level – Low, Level 3 Functions for the RPS Response Time tests. The revised response time definition includes the allowance to exclude the sensor, thus the ITS surveillance is not changed to include the footnote allowance.	SR 3.3.1.1.17 Table 3.3.1-2 footnote ##	4.3.1.3,
A.4	CTS Table 3.3.1-1 Note (d) states that the Reactor Vessel Steam Dome Pressure—High Function (Functional Unit 3) is not required to be OPERABLE in MODE 2 when the reactor vessel head is removed per CTS 3.10.1. CTS Table 3.3.1-1 Note (f) states that the Primary Containment Pressure—High Function (Functional Unit 7) is not required to be OPERABLE in MODE 2 when PRIMARY CONTAINMENT INTEGRITY is not required in MODE 2 (i.e., when Special Test Exception 3.10.1 is being used). These notes are deleted from CTS Table 3.3.1-1 since the only applicable condition in which these notes would be needed has been deleted.	N/A	Table 3.3.1-1 Notes (d) and (f)
A.5	All MSIV channels are required to be OPERABLE to assure a scram with the worst case single failure. In the ITS, each MSIV contact is viewed as a separate channel (a total of 16 channels). Therefore, the minimum number of channels per trip system is more appropriately specified as "8" in Function 5 of ITS Table 3.3.1.1-1. In addition, the reactor mode switch (CTS Table 3.3.1-1, Functional Unit 11) input to all four logic strings of the RPS trip logic. All four channels of this Function are required to be OPERABLE to assure a manual scram with the worst single failure. Therefore, the minimum channels per trip system is more appropriately specified as "2" in ITS Table 3.3.1.1-1 Function 10.	Table 3.3.1.1-1 Functions 5 and 10	Table 3.3.1-1 Functional Units 5 and 11

A.6	The Scram Discharge Volume Water Level—High Function (CTS Table 3.3.1-1, Functional Unit 8) has two separate inputs to the RPS logic; a level switch and a transmitter/trip unit. Each of these input into all four logic strings of the RPS trip logic. All four channels of each type are required to be OPERABLE to ensure diversity. Therefore, the Function has been divided into two separate types, each with two channels per trip system.	Table 3.3.1.1-1 Functions 7.a and 7.b	Table 3.3.1-1 Functional Unit 8
A.7	Clarifies the Applicability of ITS 3.3.1.1 Functions 7.a and 7.b, which requires the Functions to be OPERABLE in MODE 5 only with any control rod withdrawn from a core cell containing one or more fuel assemblies, by removing the cross references to the Special Operations LCOs.	Table 3.3.1.1-1 Functions 7.a and 7.b	Table 3.3.1-1 Note (h)
A.8	~~Not used~~ INSERT A.8	3.3.1.1 Required Action H.1	Table 3.3.1-1 Actions 3 and 9
A.9	Removes the CHANNEL FUNCTIONAL TEST Surveillance Frequency of "S/U" and Note (c) of CTS Table 4.3.1.1-1 for Functional Units 1.a and 2.a "within 24 hours before startup, if not performed within the previous 7 days." These notations are redundant to the requirements of proposed SR 3.0.4, which requires the periodic weekly Surveillances to be performed and current prior to entry into the applicable operational conditions.	LCO 3.0.4	Table 4.3.1.1-1 Functional Units 1.a and 2.a Frequency and Note (c)
A.10	The CTS Table 4.3.1.1-1, Functional Unit 2.b requirement to perform a daily CHANNEL CHECK on the APRM Flow Biased Simulated Thermal Power—Upscale Function has been deleted, since it provides information redundant to other Surveillance Requirements (i.e., CTS 4.4.1.2.1 and 4.4.1.2.2) and the 12 hour channel check is retained.	N/A	Table 4.3.1.1-1 Functional Unit 2.b Frequency and Note (g)
A.11	The CTS Limiting Safety System Settings (Setpoints) Table 2.2.1-1 has been combined with the current RPS Technical Specification (CTS 3/4.3.1). The information in CTS Table 2.2.1-1 is located in ITS Table 3.3.1.1-1.	3.3.1.1, Table 3.3.1.1-1	Table 2.2.1-1, 3/4.3.1
A.12	CTS Table 2.2.1-1 footnote *, referencing Bases Figure B 3/4.3-1, has been deleted since the figure provides design information showing the relative locations of reactor vessel water level instruments. This information is already essentially contained in the Allowable Value column of this Table.	N/A	Table 2.2.1-1 footnote *
A.13	The simulated thermal power time constant associated with the APRM Flow Biased Simulated Thermal Power—Upscale Function, identified in CTS Table 4.3.1.1-1, Note (g) as 6 ± 1 seconds, has been changed to ≤ 7 seconds, since the hardware design prevents setting this constant below 5 seconds.	SR 3.3.1.1.14	Table 4.3.1.1-1 Note (g)

NRC See comment 1

INSERT A.8 (LCO 3.3.1.1 LaSalle)

Enhances presentation by requiring actions to be immediately initiated to insert control rods (completing the actions as soon as possible) in lieu of current requirement to insert the control rods in 1 hour (initiating the actions as soon as possible).

A.14	CTS requirements for the Turbine Stop Valve – Closure and the Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure – Low to be operable in Mode 1 are only required in ITS to be operable when Thermal Power is ≥ 25% rated thermal power. Automatic bypasses disable this trip at < 25% RTP.	Table 3.3.1.1-1 Functions 8 and 9	Table 3.3.1-1 and Table 4.3.1.1-1 Functional Units ~~8~~ and ~~9~~ 9 10
3.3.1.2, SRM Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.1.2	3/4.3.7.6, 3/4.9.2
A.2	CTS requirements to "verify all insertable control rods...inserted," are replaced in ITS 3.3.1.2 Required Action D.1 with an equivalent but more definitive requirement to "Fully insert...."	3.3.1.2 Required Action D.1	3.3.7.6 Action b
A.3	Adds a Note to the Surveillance Requirements to provide direction for proper application of the Surveillance Requirements for Technical Specification compliance.	3.3.1.2 Surveillance Requirements Note	N/A
A.4	Adds to the CTS 3.9.2 Action the phrase, "except for control rod insertion." CTS and ITS definition of a CORE ALTERATION includes control rod insertion and to comply with the CTS action to suspend CORE ALTERATIONS means to stop any <u>additional</u> CORE ALTERATIONS but not control rod insertion.	3.3.1.2 ACTION E	3.9.2 Action
A.5	Deletes the footnote that states the normal or emergency power source may be inoperable since it duplicative of the ITS definition of OPERABILITY.	1.1 OPERABLE-OPERABILITY definition	3.9.2 footnote #
3.3.2.1, Control Rod Block Instrumentation			

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A.1	Editorial changes, reformatting, and revised numbering.	3.3.2.1	3/4.3.6, 3/4.1.4.1, 3/4.1.4.3
A.2	The reference to "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 30% of RATED THERMAL POWER" is not used in the ITS. In both the CTS and ITS with THERMAL POWER ≥ 30% RTP, the unit will always be in MODE 1 (Operational Condition 1). In addition, CTS Tables 3.3.6-1 and 4.3.6-1 footnote * and LCO 3.1.4.3 (ITS Table 3.3.2.1-1 Note (a)) have been modified to not require the RBM to be Operable when a peripheral control rod is selected, since this Note explains the RBM design feature which includes an automatic bypass when a peripheral rod is selected.	Table 3.3.2.1-1 Functions 1.a, 1.b, and 1.c, and Note (a)	Tables 3.3.6-1 and 4.3.6-1 Trip Functions 1.a, 1.b, and 1.c, including footnote *, 3.1.4.3
A.3	Deletes the allowance in CTS 3.1.4.1 Action c, which states that the provisions of Specification 3.0.4 are not applicable, since ITS LCO 3.0.4 provides this allowance.	N/A	3.1.4.1 Action c
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.2.2	3/4.3.8
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.2.2 ACTIONS Note	3.3.8 Actions
A.3	The revised presentation of CTS 3.3.8 Action b.2 does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	N/A	3.3.8 Action b.2
A.4	Since no separate system functional test is specified, the operation of the breaker and valves is specifically identified and included with the LOGIC SYSTEM FUNCTIONAL TEST of ITS SR 3.3.2.2.4. Therefore, the term "simulated automatic operation" is not needed and has been deleted.	SR 3.3.2.2.4	4.3.8.2
A.5	CTS Table 3.3.8-2 footnote *, referencing Bases Figure B 3/4.3-1, has been deleted since the figure provides design information showing the relative locations of reactor vessel water level instruments. This information is already essentially contained in the Allowable Value column of this Table.	N/A	3.3.8-2 footnote *

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3.3.3.1, Post Accident Monitoring Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.3.1	3/4.3.7.5, LCO 3.4.2, 3.4.2 Action b, 4.4.2.1 including footnote **
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each Function," which is consistent with the intent of the CTS.	3.3.3.1 ACTIONS Note 2	3.3.7.5 Actions
A.3	Moves the details concerning the technical content of the Special Report specified in CTS 3.3.7.5 Action 81.2) to ITS 5.6.	5.6	3.3.7.5 Action 81.2)
A.4	Not used.	N/A	N/A
A.5	Deletes the MINIMUM CHANNELS OPERABLE column of CTS Table 3.3.7.5.-1, since the ITS provides explicit Conditions for the number of inoperable channels.	N/A	Table 3.3.7.5-1
3.3.3.2, Remote Shutdown Monitoring System			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.3.2	3/4.3.7.4
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each Function," which is consistent with the intent of the CTS.	3.3.3.2 ACTIONS Note 2	3.3.7.4 Actions
3.3.4.1, EOC-RPT Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.4.1	3/4.3.4.2, 3.2.3, 3.2.3 Action b

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A.2	Adds an additional LCO option to permit a MCPR penalty to be applied in lieu of maintaining the EOC-RPT Instrumentation Operable, consistent with the current licensing basis as indicated in CTS 3.3.4.2 Actions d and e, and CTS 3.2.3 Action a.	LCO 3.3.4.1.b	3.3.4.2 Actions d and e, 3.2.3 Action a
A.3	The reference to "OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER" is not used in the ITS. In both the CTS and ITS with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1 (Operational Condition 1).	3.3.4.1 Applicability	3.3.4.2 Applicability, 3.2.3 Applicability
A.4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.4.1 ACTIONS Note	3.3.4.2 Actions
A.5	Since no separate system functional test is specified, the operation of the recirculation pump trip breakers is specifically identified and included with the LOGIC SYSTEM FUNCTIONAL TEST of ITS SR 3.3.4.1.3. Therefore, the term "simulated automatic operation" is not needed and has been deleted.	SR 3.3.4.1.3	4.3.4.2.2
A.6	Adds clarifying Note that states: "Breaker arc suppression time may be assumed from the most recent performance of SR 3.3.4.1.6," which is consistent with intent of the CTS.	SR 3.3.4.1.5 Note ~~1~~	N/A
	3.3.4.2, ATWS-RPT Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.4.2	3/4.3.4.1
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.4.2 ACTIONS Note	3.3.4.1 Actions
A.3	Provide an option to restore the channel to Operable status in lieu of tripping the channel. This option is consistent with CTS allowances.	3.3.4.2 Required Action A.1	3.3.4.1 Action b
A.4	Since no separate system functional test is specified, the operation of the recirculation pump trip breakers is specifically identified and included with the LOGIC SYSTEM FUNCTIONAL TEST of ITS SR 3.3.4.2.4. Therefore, the term "simulated automatic operation" is not needed and has been deleted.	SR 3.3.4.2.4	4.3.4.1.2

A.5	CTS Table 3.3.4.1-2 footnote *, referencing Bases Figure B 3/4.3-1, has been deleted since the figure provides design information showing the relative locations of reactor vessel water level instruments. This information is already essentially contained in the Allowable Value column of this Table.	N/A	Table 3.3.4.1-2 footnote *
	3.3.5.1, ECCS Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.5.1	3/4.3.3, 4.4.2.2
A.2	The word "trip" in CTS 4.3.3.3 has been deleted for clarity because the ITS definition of ECCS Response Time includes mechanical end devices such as the pump or valve in addition to the instrumentation.	N/A	4.3.3.3
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.1 ACTIONS Note	3.3.3 Actions
A.4	If an ADS trip system is not restored within the specified time, ITS 3.3.5.1 ACTION G requires the ADS valves to be declared inoperable and the ACTION provided in the ADS Specification (ITS 3.5.1) to be taken, in lieu of repeating the shutdown Actions in the instrumentation Specification.	3.3.5.1 ACTION G	3.3.3 Action c
A.5	The allowance contained in CTS Table 3.3.3-3 to exclude the ECCS actuation instrumentation from the ECCS Response Time Test is deleted. The revised response time definition includes the allowance to exclude the sensor, thus the ITS surveillance is not changed to include the footnote allowance.	N/A	Table 3.3.3-3 footnote #

A.6	Moves the technical content of the loss of power instrumentation requirements of CTS Tables 3.3.3-1, 3.3.3-2, and 4.3.3.1-1, Trip Functions D.1 and D.2, including CTS Table 3.3.3-1 Action 37 and footnotes (d) and **, CTS Table 3.3.3-2 footnote #, and CTS Table 4.3.3.1-1 footnote **, to ITS 3.3.8.1, "Loss of Power Instrumentation."	3.3.8.1	Table 3.3.3-1, 3.3.3-2, and 4.3.3.1-1 Trip Functions D.1 and D.2, including Table 3.3.3-1 Action 37 and footnotes (d) and **, Table 3.3.3-2 footnote #, and Table 4.3.3.1-1 footnote **
A.7	CTS Table 3.3.3-1 Actions require declaring the associated system or ADS Trip System inoperable when the time to restore the channel has expired. CTS 3.3.3 Action c provides 72 hours or 7 days to restore the ADS Trip System, depending upon whether or not both RCIC and HPCS systems are Operable. When the restoration time expires, a shutdown is required. In the ITS, the requirement to declare the associated system inoperable has been replaced with the total time to restore the channel. Thus, four CTS Actions are combined into two ITS ACTIONS.	3.3.5.1 ACTIONS E and F	Table 3.3.3-1 Actions 30, 32, and 34, 3.3.3 Action c
A.8	CTS requires, when an associated HPCS channel is inoperable, placing the trip system in the tripped condition within 24 hours. ITS requires placing the channel(s) in trip within 24 hours, since there is no manual pushbutton or switch to place only the associated trip system in trip.	3.3.5.1 Required Action B.3	3.3.3-1 Action 35
A.9	Replaces the CHANNEL FUNCTIONAL TEST of Table 4.3.3.1-1 Trip Functions A.1.h, A.2.g, B.1.f, B.2.f, and C.1.h (the Manual Initiation Functions) with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.5.1, which is a complete test of the logic, including the Manual Initiation switches and push buttons, and is performed at the same Frequency.	N/A	4.3.3.1 for Table 4.3.3.1-1 Trip Functions A.1.h, A.2.g, B.1.g, B.2.g, and C.1.h

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A.10	CTS Table 3.3.3-2 footnote *, referencing Bases Figure B 3/4.3-1, has been deleted since the figure provides design information showing the relative locations of reactor vessel water level instruments. This information is already essentially contained in the Allowable Value column of this Table.	N/A	Table 3.3.3-2 footnote *
A.11	The CTS footnote containing design information about ADS trip system functions that also initiate the associated division diesel generator is not repeated in the ITS for the common LPCI/LPCS systems functions since the divisions are the same.	Table 3.3.5.1-1 N/A	CTS Table 3.3.3-1 Functions A.2.a, A.2.b, B.2.a, B.2.b, footnote b
	3.3.5.2, RCIC System Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.5.2	3/4.3.5
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.5.2 ACTIONS Note	3.3.5 Actions
A.3	Changes the column title to be on a per Function basis in ITS Table 3.3.5.2-1 rather than the per Trip System basis in CTS Table 3.3.5-1. Thus, the number of required channels for CTS Table 3.3.5-1 Functional Unit a (Reactor Vessel Water Level—Low Low, Level 2) is changed to "4", since there are two trip systems for this Functional Unit, with two channels per trip system.	Table 3.3.5.2-1	Table 3.3.5-1
A.4	Divides CTS Table 3.3.5-1 Action 51 into two ACTIONS in the ITS, one ACTION requiring restoration within 24 hours and the other ACTION requiring the RCIC System be declared inoperable immediately. The two ITS ACTIONS are consistent with the CTS.	3.3.5.2 ACTIONS C and E	Table 3.3.5-1 Action 51
A.5	Replaces the CHANNEL FUNCTIONAL TEST of Table 4.3.5.1-1 Functional Unit c (the Manual Initiation Function) with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.5.1, which is a complete test of the logic, including the Manual Initiation switch and push button, and is performed at the same Frequency.	SR 3.3.5.2.4	4.3.5.1 for Table 4.3.5.1-1 Functional Unit c
A.6	CTS Table 3.3.5-2 footnote *, referencing Bases Figure B 3/4.3-1, has been deleted since the figure provides design information showing the relative locations of reactor vessel water level instruments. This information is already essentially contained in the Allowable Value column of this Table.	N/A	Table 3.3.5-2 footnote *

	3.3.6.1, Primary Containment Isolation Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.1	3/4.3.2
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," and revises the wording for CTS Action b and CTS Action c ("One or more channels" and "One or more automatic Functions"), which is consistent with the intent of the CTS.	3.3.6.1 ACTIONS Note and ACTIONS A and B	3.3.2 Actions
A.3	Response time testing for Primary Containment Isolation Functions, except CTS Table 3.3.2-3 Trip Functions A.1.a.3), A.1.c.2), and A.1.c.3) are deleted since they are listed as "N/A" in CTS Table 3.3.2-3.	N/A	4.3.2.3
A.4	Deletes the statement concerning the details on the frequency of performing CTS 4.3.2.3, the Isolation System Response Time test, since it is covered by the definition of STAGGERED TEST BASIS.	N/A	4.3.2.3
A.5	The list of individual CTS primary containment isolation instrumentation Functions are divided into five sections: Main Steam Line Isolation, Primary Containment Isolation, RCIC System Isolation, RWCU System Isolation, and RHR Shutdown Cooling System Isolation.	Table 3.3.6.1-1 Functions 1, 2, 3, 4, and 5	Tables 3.3.2-1, 3.3.2-2, and 4.3.2.1-1
A.6	Moves the requirements identified in CTS Tables 3.3.2-1, 3.3.2-2, 3.3.2-3, and 4.3.2.1-1 related to Secondary Containment Isolation (as described in footnotes (c), (e), **, and # to Table 3.3.2-1 and footnotes ** and # to Table 4.3.2.1-1) to ITS 3.3.6.2, "Secondary Containment Isolation Instrumentation."	3.3.6.2	Tables 3.3.2-1 (including footnotes (c), (e), **, and #), 3.3.2-2, 3.3.2-3, and 4.3.2.1-1 (including footnotes ** and #)
A.7	CTS Table 3.3.2-2 identifies the Allowable Value for the RCIC Steam Line Flow — High Trip Function as "≤ 295% of rated flow, 185" H_2O". These are equivalent values and considered redundant. ITS retains only the Allowable Value in terms of inches water.	Table 3.3.6.1-1/Function 3.a	Table 3.3.2-2 Trip Function 4.a

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A.8	The CTS action to "declare the affected system inoperable" is deleted since this instruction is essentially a "cross reference" between Technical Specifications.	N/A	Table 3.3.2-1 Actions 22, 25, and 26
A.9	Provides the actual number of channels for the SLCS Initiation Function, in lieu of the CTS "N/A." In addition, footnote (b) has been added which states that the channels only input into one of two trip systems, consistent with CTS Table 3.3.2-1 footnote (f).	Table 3.3.6.1-1 Function 4.l, including footnote (b)	Table 3.3.2-1 Trip Function A.3.d and footnote (f)
A.10	The revised response time definition includes the allowance to exclude the sensor, thus the ITS surveillance is not changed to include the footnote allowance.	N/A	Table 3.3.2-3 footnote ##
A.11	CTS Table 3.3.2-2 footnote *, referencing Bases Figure B 3/4.3-1, has been deleted since the figure provides design information showing the relative locations of reactor vessel water level instruments. This information is already essentially contained in the Allowable Value column of this Table.	N/A	Table 3.3.2-2 footnote *
A.12	Replaces the CHANNEL FUNCTIONAL TEST of Table 4.3.2.1-1 Trip Function A.3.d, SLCS Initiation, and for the Manual Initiation Trip Function B, with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.6.1, which is a complete test of the logic, including the Manual Initiation switches and push buttons, and is performed at the same Frequency.	SR 3.3.6.1.5	4.3.2.1 for Table 4.3.2.1-1 Trip Functions A.3.d and B
	3.3.6.2, Secondary Containment Isolation Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.6.2	3/4.3.2, 4.6.5.3.d.2
A.2	Response time testing for Secondary Containment Isolation Functions are deleted since they are listed as "N/A" in CTS Table 3.3.2-3.	N/A	4.3.2.3
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," and revises the wording for CTS Action b and CTS Action c ("One or more channels" and "One or more automatic Functions"), which is consistent with the intent of the CTS.	3.3.6.2 ACTIONS A and B	3.3.2 Actions

A.4	Section A, Automatic Initiation title in CTS Tables 3.3.2-1, 3.3.2-2, and 4.3.2.1-1 has been deleted since only the secondary containment isolation functions are being included in proposed ITS 3.3.6.2.	N/A	Tables 3.3.2-1, 3.3.2-~~0~~ 2, and 4.3.2.1-1 Section A Title
A.5	The CTS replaces the use of the term SECONDARY CONTAINMENT INTEGRITY with the elements of that term and clarifies the need to isolate SCIVs and start the associated SGT subsystem(s).	3.3.6.2 Required Actions C.1.1 and C.2.1	Table 3.3.2-1 Action 24
A.6	CTS Table 3.3.2-2 footnote *, referencing Bases Figure B 3/4.3-1, has been deleted since the figure provides design information showing the relative locations of reactor vessel water level instruments. This information is already essentially contained in the Allowable Value column of this Table.	N/A	Table 3.3.2-1 footnote *
A.7	Replaces the CHANNEL FUNCTIONAL TEST for Table 4.3.2.1-1 Trip Functions B.3 and B.4 (the Manual Initiation Functions), with a LOGIC SYSTEM FUNCTIONAL TEST in ITS 3.3.6.2, which is a complete test of the logic, including the Manual Initiation switches and push buttons, and is performed at the same Frequency.	SR 3.3.6.2.4	4.3.2.1 for Table 4.3.2.1-1 Trip Functions B.3 and B.4
A.8	Divides the technical content of CTS 4.6.5.3.d.2, the system functional test of the SGT System, into two Surveillances.	SR 3.3.6.2.4, 3.6.4.3 Surveillance Requirements	4.6.5.3.d.2
A.9	The shutdown requirement of CTS Table 3.3.2-1 Action 26.a has been deleted since the requirements of Action 26.b can always be taken	N/A	Table 3.3.2-1 Action 26.a
3.3.7.1, CRAF System Isolation Instrumentation			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.7.1	3/4.3.7.1, 4.7.2.d

A.2	CTS 3/4.3.7.1 specifies requirements on radiation monitoring instrumentation. The only instrumentation listed is the Main Control Room Atmospheric Control System Radiation Monitoring subsystem. In ITS 3.3.7.1, this instrumentation is known as the Control Room Area Filtration (CRAF) System Instrumentation. Therefore, the title, the LCO statement, Actions, Surveillance Requirement, and Tables have been modified to require this Function. In addition, the alarm/trip setpoint column in CTS Table 3.3.7.1-1 has been changed to an Allowable Value in ITS SR 3.3.7.1.3.	3.3.7.1	3/4.3.7.1
A.3	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.7.1 ACTIONS Note	3.3.7.1 Actions
A.4	Deletes the allowance that states that the provisions of Specification 3.0.3 are not applicable, since the Conditions and Required Actions of ITS 3.3.7.1 will adequately cover all potential conditions for inoperable equipment in the system.	N/A	3.3.7.1 Action c
A.5	Deletes the footnote that states the normal or emergency power source may be inoperable for the instrumentation since it duplicative of the ITS definition of OPERABILITY.	1.1 OPERABLE-OPERABILITY definition	3.3.7.1 footnote *
A.6	Divides the technical content of CTS 4.7.2.d.2, the system functional test of the CRAF System, into two Surveillances.	SR 3.3.7.1.4, 3.7.4 Surveillance Requirements	4.7.2.d.2
	3.3.8.1, Loss of Power Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.3.8.1	3/4.3.3.3
A.2	A new LCO, ITS 3.3.8.1, has been written specifically for the Loss of Power (LOP) Instrumentation. The LOP Function from the current ECCS instrumentation Specification (CTS 3/4.3.3) is incorporated into this LCO. ITS 3.3.8.1 requires the instruments listed in ITS Table 3.3.8.1-1 to be OPERABLE, and the Table has the appropriate Functions from CTS Table 3.3.3-1 listed.	3.3.8.1	3/4.3.3

A.3	Deletes the ECCS Response Time Surveillance for this instrumentation since there is no requirement to measure Loss of Power instrumentation response time.	N/A	4.3.3.3, Table 3.3.3-3 Item 5
A.4	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each channel," which is consistent with the intent of the CTS.	3.3.8.1 ACTIONS Note	3.3.3 Actions
A.5	Deletes references to "take the ACTION required by..." in CTS Table 3.3.3-1 Action 37, since the format of the ITS does not include providing "cross references." The individual Specifications adequately prescribe the Required Actions for inoperable systems, subsystems, trains, components, and devices without such references.	N/A	Table 3.3.3-1 Action 37
3.3.8.2, RPS Electric Power Monitoring			
A.1	Editorial changes, reformatting, and revised numbering.	3.3.8.2	3/4.8.3.4
A.2	The revised presentation of CTS 3.8.3.4 Actions a and b does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.8.3.4 Actions a and b
A.3	A new ACTION is provided that requires a shutdown if the Required Actions of Condition A or B are not met when the unit is in MODE 1, 2, or 3. This action is functionally equivalent to the CTS 3.0.3, which is currently required if CTS 3.8.3.4 Actions a and b are not met (although CTS 3.0.3 does provide an additional 1 hour to commence the shutdown).	3.3.8.2 ACTION C	3.8.3.4 Actions a and b
A.4	CTS 4.8.3.4.b includes RPS electric power monitoring assembly "setpoints," It is proposed to re-label these "setpoints" as "Allowable Values," since under current plant procedures and practices, the overvoltage, undervoltage, and underfrequency trip setpoints specified in CTS 4.8.3.4.b are applied as Allowable Values.	SR 3.3.8.2.2	4.8.3.4.b
Current Specification 3/4.3.7.3, Meteorological Monitoring Instrumentation			
NONE	NONE	NONE	NONE

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Current Specification 3/4.3.7.11, Explosive Gas Monitoring Instrumentation			
NONE	NONE	NONE	NONE
Current Specification 3/4.3.7.12, Loose Part Detection System			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, Recirculation Loops Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.1	3.4.1.1, 3/4.4.1.3, 3/4.4.1.5
A.2	CTS 3.4.1.1 has been rewritten into two distinct options, with the first option requiring two recirculation loops and the second option only requiring one recirculation loop with the added requirements of CTS 3.4.1.1 ACTIONS a.1.c), a.1.d and a.1.e).	LCO 3.4.1, 3.4.1 ACTION G	LCO 3.4.1.1, 3.4.1.1 Action a
A.3	Deletes: 1) CTS 3.4.1.1 Action a, which requires compliance with Specification 3.4.1.5 when only one reactor coolant recirculation loop is in operation; 2) CTS 3.4.1.1 Action b.1, which requires performing the Actions of Specification 3.4.1.5 when no reactor coolant recirculation loops are in operation; and 3) CTS 3.4.1.5 Action a.2.c), which requires performing Specification 3.4.1.1 Action b.2 when no recirculation loops are in operation. ITS prescribes the necessary conditions for compliance without such references.	N/A	3.4.1.1 Actions a, and b.1, 3.4.1.5 Action a.2.c)
A.4	Deletes the requirement to increase the MCPR safety limit per CTS 2.1.2 when only one recirculation loop is in operation, since the Safety Limit requirement is currently specified as the single loop limit; thus, when the plant is in single loop, the limit applies immediately, not in 4 hours as allowed by CTS 3.4.1.1 Action a.1.b).	N/A	3.4.1.1 Action a.1.b)
A.5	Deletes the requirement to reduce the Average Power Range Monitor (APRM) Rod Block Setpoints since this function has been relocated to the Technical Requirements Manual. In addition, deletes reference to APRM Scram and RBM Trip Setpoints since the trip setpoints are an operational detail.	N/A	3.4.1.1 Action a.1.d)
A.6	Revises wording to specify "jet pump" flow mismatch rather than "recirculation loop" flow mismatch. The flow in the recirculation loop and jet pump loop is proportional, and the measurement of jet pump loop flow versus recirculation loop flow is consistent with the assumptions of the LOCA analysis cited in UFSAR.	LCO 3.4.1, SR 3.4.1.1	LCO 3.4.1.3, 4.4.1.3
A.7	Deletes the requirement to restore the recirculation loop flows to within the limits if they are not within the limits. ITS does not explicitly detail options to "restore...to within the specified limit" when an alternate ACTION is provided that allows continued operation.	N/A	3.4.1.3 Action a

A.8	Deletes duplicative requirement CTS 3.4.1.5.a, which requires the total core flow to be $\geq$ 45% of rated core flow during forced core circulation operation. It is encompassed by CTS 3.4.1.5.b, which requires THERMAL POWER to be within Region III of CTS Figure 3.4.1.5-1.	N/A	LCO 3.4.1.5.a
A.9	Moves CTS LCO 3.4.1.5.c and 4.4.1.5 requirements into an ACTION in the ITS and editorially revises them for clarity.	3.4.1 ACTION A	LCO 3.4.1.5.c, 4.4.1.5
A.10	Deletes the requirement to reduce thermal power to below 36% RTP by "inserting control rods" when no recirculation loops are in operation, since the only acceptable operational method of reducing thermal power to below 36% RTP when no recirculation loops are in operation is by the insertion of the control rods.	N/A	3.4.1.5 Action a.2.a)
A.11	Not used.	N/A	N/A
A.12	Clarified that the total time allowed to complete the APRM and LPRM neutron flux noise levels verification Surveillance is 45 minutes.	3.4.1 ACTION A	4.4.1.5.1.b
A.13	Clarifies that forced circulation is required to be maintained with flow within the limits of CTS Figure 3.4.1.5-1 in MODE 2, as well as the currently specified MODE 1, to be consistent with the current requirement that two recirculation loops shall be in operation. Since the region of instability is > 30% RTP, it is not operationally possible to be in the region of instability in MODE 2, therefore, this change is considered administrative.	LCO 3.4.1	3.4.1.5
A.14	Deletes CTS 3.4.1.3 Action b, referencing CTS 3.4.1.1, since the statement only serves as a cross reference.	N/A	3.4.1.3 Action b
	3.4.2, Flow Control Valves		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.2	4.4.1.1
A.2	Adds new LCO, Applicability, and ACTIONS to clarify the CTS intent for OPERABILITY of the Recirculation System flow control valves.	3.4.2	4.4.1.1
	3.4.3, Jet Pumps		

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

A.1	Editorial changes, reformatting, and revised numbering.	3.4.3	3/4.4.1.2
A.2	Modifies the term "loop flow" to "loop drive flow" to provide clarification of the CTS intent.	SR 3.4.3.1.a	4.4.1.2.1.a, 4.4.1.2.2.a
A.3	Adds the word "calculated" to CTS 4.4.1.2.1.b and CTS 4.4.1.2.2.b to differentiate between the indicated total core flow and the calculated total core flow.	SR 3.4.3.1.b	4.4.1.2.1.b, 4.4.1.2.2.b
	3.4.4, Safety/Relief Valves		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.4	3/4.4.2
A.2	Moves the requirements associated with safety valve position indication to ITS 3.3.3.1.	3.3.3.1	LCO 3.4.2, 3.4.2 Action b, 4.4.2.1 (including footnote **)
A.3	Moves the requirements associated with the ADS function instrumentation to ITS 3.3.5.1.	3.3.5.1	4.4.2.2
A.4	Adds a Surveillance Requirement to verify the proper lift setpoints of the required S/RVs are within limits in accordance with the Inservice Testing Program, since CTS 4.0.5 currently requires this type of testing.	SR 3.4.4.1	N/A
	3.4.5, RCS Operational Leakage		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.5	3/4.4.3.2
A.2	Editorially changes "any 24 hour period" to "the previous 24 hour period."	LCO 3.4.5.c, LCO 3.4.5.d	LCO 3.4.3.2.c, LCO 3.4.3.2.e
A.3	Moves the RCS pressure isolation valve and high/low pressure interface valve leakage pressure monitors requirements to ITS ~~A~~ 3.4.6.	3.4.6	LCO 3.4.3.2.d, 3.4.3.2 Actions c and d, 4.4.3.2.2

A.4	Adds an option to reduce the leakage to within the limit in lieu of identifying the source, since restoring compliance with the LCO is always an option.	3.4.5 ACTION B	N/A
	3.4.6, RCS Pressure Isolation Valve Leakage		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.6	3/4.4.3.2
A.2	Adds ITS Notes "Separate Condition entry is allowed for each flow path" and "Enter applicable Conditions and Required Actions for systems made inoperable by PIVs," which are consistent with the intent of the CTS.	3.4.6 ACTIONS Notes 1 and 2	3.4.3.2 Actions
A.3	(Unit 1 only) Deletes the one time exception to the surveillance test requirement for certain pressure isolation valves, which applied until the first refueling outage.	N/A	Table 3.4.3.2-1 footnote *
	3.4.7, RCS Leakage Detection Instrumentation		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.7	3/4.4.3.1
A.2	Adds an Action to explicitly identify that LCO 3.0.3 is required to be entered if all required RCS leakage detection systems are inoperable, which is consistent with the intent of the CTS.	3.4.7 ACTION F	3.4.3.1, 3.0.3
A.3	(Unit 1 only) Deletes the one time exception to the surveillance test requirement for the drywell sump flow monitoring system channel calibration, which applied until the first refueling outage.	N/A	4.4.3.1.b footnote *
	3.4.8, RCS Specific Activity		
A.1	Editorial changes, reformatting, and revised numbering.	3.4.8	3/4.4.5
A.2	Deletes CTS 3.4.5 Action c requiring increased sampling under certain conditions (as specified in CTS Table 4.4.5-1, Item 4.b) when the LCO 3.4.5.a limit is exceeded. CTS 3.4.5 Action b already requires the same sampling to be performed every 4 hours at all times when the LCO 3.4.5.a limit is not met, not just when the special conditions specified in Action c are met.	N/A	3.4.5 Action c

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

3.4.9, RHR Shutdown Cooling System - Hot Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.9	3/4.4.9.1
A.2	Deletes allowance to remove the RHR shutdown cooling loop from operation during hydrostatic tests since these tests are not performed in MODE 3.	N/A	3.4.9.1 footnote ##
A.3	Adds ITS Note "Separate Condition entry is allowed for each. RHR shutdown cooling subsystem," which is consistent with the intent of the CTS.	3.4.9 ACTIONS Note 2	3.4.9.1 Actions
A.4	Deletes the requirement to demonstrate every 24 hours the OPERABILITY of at least one alternate method capable of decay heat removal for each inoperable RHR shutdown cooling loop. It is unnecessary since the Specification requires that reactor be in MODE 4 within 24 hours (which exits this Specification), and CTS 3.4.9.2 and the ITS 3.4.10 both require the periodic verification of the availability of an alternate decay heat removal method.	N/A	3.4.9.1 Action a
A.5	Deletes the requirement which allows the unit to maintain reactor coolant temperature as low as practical in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4.	N/A	3.4.9.1 Footnote **
3.4.10, RHR Shutdown Cooling System - Cold Shutdown			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.10	3/4.4.9.2
A.2	Not used.	N/A	N/A
A.3	Adds ITS Note, "Separate Condition entry is allowed for each RHR shutdown cooling subsystem," which is consistent with the intent of the CTS.	3.4.10 ACTIONS Note	3.4.9.2 Actions
A.4	Deletes the footnote that states the normal or emergency power source may be inoperable for the RHR pump since it duplicative of the ITS definition of OPERABILITY.	1.1 OPERABLE-OPERABILITY definition	LCO 3.4.9.2 footnote *

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

3.4.11, RCS Pressure and Temperature Limits			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.11	3/4.4.6.1, 3/4.4.1.4
A.2	Clarifies Action to "perform an engineering evaluation..." with Notes that state the determination that the acceptability of the RCS for continued operation must be completed any time the requirements of the LCO are not met.	3.4.11 Conditions A and C Notes	3.4.6.1 Action
A.3	Changes the CTS Action to "restore...within 30 minutes" to "initiate action to restore ...Immediately" for conditions other than MODES 1, 2, and 3, which is consistent with the intent of the CTS.	3.4.11 Required Action C.1	3.4.6.1 Action
A.4	Deletes the reactor vessel material specimen Surveillance since it is a duplication of the regulations found in 10 CFR 50 Appendix H.	N/A	4.4.6.1.3
A.5	Adds Notes to clarify the current intent in CTS 4.4.6.1.4.a (periodic verification that reactor vessel flange and head flange temperatures are within limits) of allowing entry into the applicable conditions (i.e., when ≤ 92°F for Unit 1 and ≤ 106°F for Unit 2, and ≤ 77°F for Unit 1 and ≤ 91°F for Unit 2) without having performed these SRs.	SR 3.4.11.6 Note, SR 3.4.6.7 Note	4.4.6.1.4.a
A.6	Deletes the requirement to verify the reactor vessel and head flange temperatures within 30 minutes prior to tensioning of the head bolting studs, since it is duplicative of ITS SR 3.0.1.	SR 3.0.1	4.4.6.1.4.b
A.7	The idle recirculation loop startup requirements have been combined into the RCS Pressure and Temperature Limits Specification, with the words "and the recirculation pump starting temperature requirements" added to the ITS 3.4.11 LCO statement. The actual description of the requirements and the limits are found in the Surveillance Requirements.	LCO 3.4.11, SR 3.4.11.3, SR 3.4.11.4	LCO 3.4.1.4
A.8	Deletes the requirement to monitor the temperature difference between an idle loop and an operating loop, since they are redundant to the loop-to-coolant requirement of CTS 3.4.1.4.a and 4.4.1.4 (ITS SR 3.4.11.4).	SR 3.4.11.4	LCO 3.4.1.4.b
A.9	Provides changes in the LaSalle ITS consistent with the Technical Specifications Change Request submitted to the NRC for approval per ComEd letter dated February 29, 2000.	3.4.11	3/4.4.6.1

3.4.12, Reactor Steam Dome Pressure			
A.1	Editorial changes, reformatting, and revised numbering.	3.4.12	3/4.4.6.2
Current Specification 3/4.4.8, Structural Integrity			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS-Operating		
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.1	3/4.5.1, 4.3.3.3, Table 3.3.3-3
A.2	Deletes Applicability footnote #, which provides a cross reference to CTS 3.10.6, since LCO 3.0.7 adequately prescribes the use of the Special Operations LCOs without such references.	N/A	3.5.1 footnote #
A.3	Deletes the statements in CTS 3.5.1 Actions a, b, c, d, and e that require the opposite division equipment ("provided that.."). ITS 3.5.1 ACTION G provides direction for various interrelationships between the Division 1 and/or Division 2 ECCS subsystems and the Division 3 system. ITS ACTION G requires entry into LCO 3.0.3 for various combinations of inoperable components, which is consistent with the present Actions for the same combinations.	3.5.1 ACTION G	3.5.1 Actions a, b, c, d, and e
A.4	Deletes CTS 3.5.1 Actions b.3 and d.3, footnote *, which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4, since it provides unnecessary duplication of the ACTIONS required by ITS 3.4.9.	N/A	3.5.1 Actions b.3 and d.3 footnote *
A.5	Not used.	N/A	N/A
A.6	Deletes CTS 3.5.1 LCO footnote **, referencing CTS 3.3.3, since the footnote only serves as a cross reference.	N/A	LCO 3.5.1 footnote **
	3.5.2, ECCS-Shutdown		
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.2	3/4.5.2, 3/4.5.3, 4.3.3.3, Table 3.3.3-3
A.2	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.5.2 ACTION D	3.5.2 Action b, 3.5.3 Action b
A.3	Not Used <INSERT A.3>	3.5.2 ACTION D	3.5.B Action 2, 3.5.C Action 2

NRC See Comment 1

INSERT A.3 (LCO 3.5.2 LaSalle)

Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible).

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

A.4	Removes superfluous statement that the ECCS is not required to be OPERABLE provided "that the reactor vessel head is removed, the cavity is flooded," since the other requirements of the note can only be accomplished if the vessel head is removed and the cavity flooded.	N/A	3.5.2 footnote *, 3.5.3 footnote *
A.5	Rewords SRs such that the applicable SRs for low pressure ECCS systems and for HPCS are presented in the SRs for this Specification, versus referring to the SRs in ITS 3.5.1.	SR 3.5.2.3, SR 3.5.2.4, SR 3.5.2.5, SR 3.5.2.6	4.5.2.1
A.6	Moves CTS 3.5.3.a and associated Applicability, Action a, and CTS 4.5.3.1 to ITS 3.6.2.2.	3.6.2.2	3.5.3.a, 3.5.3 Action a, 4.5.3.1
A.7	As an enhanced presentation of current intent, deletes CTS 4.5.3.2, which requires periodic verification that the specified conditions of Applicability footnote * are met when the suppression pool is inoperable.	N/A	4.5.3.2
A.8	Deletes CTS 3/4.5.3 footnote #, referencing CTS 3.6.2.1, since the footnote only serves as a cross reference.	N/A	3/4.5.3 footnote #
A.9	Not used.	N/A	N/A
	3.5.3, RCIC System		
A.1	Editorial changes, reformatting, and revised renumbering.	3.5.3	3/4.7.3
A.2	Allows deferral of the RCIC flow tests until 12 hours after adequate steam pressure and flow are available. Footnote currently allows deferral until adequate steam pressure is available.	SR 3.5.3.3, SR 3.5.3.4	4.7.3.b and 4.7.3.c.2 footnote *
A.3	Moves the RCIC DC bus and battery requirements to ITS 3.8.4, 3.8.6, and 3.8.7.	3.8.4, 3.8.6, 3.8.7	4.7.3.d
A.4	Clarifies the intent of the RCIC pump flow Surveillance to include the criteria of verifying pump flow against a system head corresponding to the reactor pressure.	SR 3.5.3.4	4.7.3.c.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, Primary Containment		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.1	3/4.6.1.1, 3/4.6.2.1
A.2	Replaces the definition of PRIMARY CONTAINMENT INTEGRITY and the references to it in CTS 3/4.6.1.1 with the requirement for primary containment to be OPERABLE, since all the requirements are specifically addressed in ITS 3.6.1.1 for the primary containment along with the remainder of the LCOs in the Primary Containment Section.	3.6.1.1, 3.6.1.2, 3.6.1.3, 3.6.2.1, 3.6.2.2	3/4.6.1.1
A.3	Deletes the cross reference to CTS 3.10.1, since the format of the ITS does not include providing "cross references".	N/A	3.6.1.1 Applicability footnote *
A.4	CTS 4.6.1.1.a (including footnote **), relating to the position verification of PCIVs, has been moved to ITS 3.6.1.3.	3.6.1.3	4.6.1.1.a including footnote **
A.5	Deletes Surveillance Requirements 4.6.1.1.c and 4.6.1.1.d, which cross reference to the requirements for the air lock and the suppression chamber. Requirements for the air lock and suppression chamber remain within the ITS; however, providing a cross reference to them only adds confusion when evaluating compliance with Primary Containment OPERABILITY.	N/A	4.6.1.1.c, 4.6.1.1.d
A.6	The drywell-to-suppression chamber bypass leakage requirement of CTS 3.6.2.1.b is presented as a supporting Surveillance for Primary Containment OPERABILITY.	SR 3.6.1.1.3	3.6.2.1.b
	3.6.1.2, Primary Containment Air Lock		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.2	3/4.6.1.3
A.2	Deletes the cross reference to CTS 3.10.1, since the format of the ITS does not include providing cross references.	N/A	3.6.1.3 Applicability footnote *

A.3	Two Notes are proposed to be added to the ITS to facilitate use and understanding of the intent of the ITS and are consistent with the intent of the CTS: 1) (For ACTIONS Note 2) considering the primary containment inoperable in the event air lock leakage results in the acceptance criteria being not met. 2) (For SR 3.6.1.2.1 Note 1) the overall air lock acceptance criteria when one air lock door is inoperable. Since the inoperability is known to be only affecting one door, the barrel and the other OPERABLE door are providing a sufficient containment barrier. Even though the overall test could not be satisfied, the Note clarifies the intent that the previous test <u>not</u> be considered "not met." In addition, ITS 3.6.1.2 Required Action C.1 will ensure that the primary containment overall leakage is evaluated, against the acceptance criteria, if an air lock is inoperable.	3.6.1.2 ACTIONS Note 2, SR 3.6.1.2.1 Note 1, 3.6.1.2 Required Action C.1	3.6.1.3 ACTIONS, 4.6.1.3.a
A.4	Adds ITS Required Action Note "Required Actions...are not applicable if...Condition C is entered", recognizing that if both doors in the air lock are inoperable, then an "OPERABLE" door does not exist to be closed (ITS 3.6.1.2 Required Actions A.1, A.2, and A.3 cannot be met).	3.6.1.2 Required Action A Note1	3.6.1.3 Actions
A.5	The revised presentation of CTS 3.6.1.3 Action a.1 does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.6.1.3 Action a.1
A.6	The requirement for performing the overall air lock leakage test is a requirement of 10 CFR 50 Appendix J, and this requirement is embodied in ITS SR 3.6.1.2.1. It is possible that the test would not be able to be performed with an inoperable air lock door, and a plant shutdown would be required due to the inability to perform the required Surveillance. However, this restriction on continued operation need not be specified (i.e., CTS 3.6.1.3 Action a.2 is deleted) since it exists inherently as a result of the required Appendix J testing. Since the ITS ACTIONS are revised to eliminate the reference to this Surveillance restriction, the exception to Specification 3.0.4 applicability (CTS 3.6.1.3 Action a.4) is not necessary and is deleted, because ITS 3.0.4 allows MODE changes provided continued operations is allowed in the ACTIONS.	SR 3.6.1.2.1	3.6.1.3 Actions a.2 and a.4
3.6.1.3, Primary Containment Isolation Valves			

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.3 4.6.1.1.a	~~3/4.6.1.1~~ 3/4.6.3, 3/4.4.7, including footnote **, 3/4.6.1.8	NRC More accurate
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path," which is consistent with the intent of the CTS.	3.6.1.3 ACTIONS Note 2	~~3/4.6.1.1~~ 3.6.3 Actions, 3.4.7 Actions, 3.6.1.8 Actions	NRC A.2 does Not affect 3/4.6.1.1
A.3	Adds ITS ACTIONS Notes to facilitate the use and understanding of the intent for a system made inoperable by inoperable PCIVs; i.e., that the applicable ACTIONS for that system also apply. This requirement is currently located in CTS 3.6.3 Action b.1.b), but it does not cover all situations. Therefore, ITS 3.6.1.3 ACTIONS Note 3 has been added to cover all situations. ITS 3.6.1.3 ACTIONS Note 4 clarifies that these "systems" include the primary containment.	3.6.1.3 ACTIONS Notes 3 and 4	3.6.3 Action b.1.b) ~~3.6.1.8 ACTIONS~~	NRC A.3 does Not affect 3.6.1.8
A.4	CTS 3.6.3 Action a and CTS 3.4.7 Action 1 do not specify penetrations with one or two isolation valves, except for reactor instrumentation line excess flow check valves. However, ITS 3.6.1.3 Condition A applies if the affected penetration has two valves, and only one is inoperable. This inherently ensures maintaining "at least one isolation valve OPERABLE." In the case of containment penetrations designed with only one isolation valve, the system boundary is considered an adequate barrier and the penetration is not considered "open" when the single isolation valve is open.	3.6.1.3 Condition A	~~3/4.6.1.1~~ 3.6.3 Action a, 3.4.7 Action 1	NRC A.4 does Not affect 3/4.6.1.1
A.5	The revised presentation of CTS 3.6.3 Actions a.1.a) and b.1.a) and CTS 3.4.7 Action 1.a) does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.6.3 Actions a.1.a) and b.1.a), 3.4.7 Action 1.a)	
A.6	Deletes the LCO 3.0.3 statement in CTS 3.6.3 Action b.1 since it is redundant to the "Otherwise..." action. That is, LCO 3.0.3 is not applicable anyway since a shutdown action has been provided.	N/A	3.6.3 Action b.1	
A.7	Incorporate the requirements, provisions, actions, and associated restoration times for MSIVs and purge valves into ITS 3.6.1.3, the primary containment isolation valve Specification.	3.6.1.3	3/4.4.7, 3/4.6.1.8, 3/4.6.3	

	3.6.1.4, Drywell and Suppression Chamber Pressure		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.4	3/4.6.1.6
	3.6.1.5, Drywell Air Temperature		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.5	3/4.6.1.7
	3.6.1.6, Suppression Chamber-to-Drywell Vacuum Breakers		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.1.6	3/4.6.4
	3.6.2.1, Suppression Pool Average Temperature		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.1	3/4.6.2.1
A.2	CTS 3.6.2.1.a.2 appears to require the 105°F limit to apply at all times in Operational Mode 1 or 2. However, this limit actually only applies when THERMAL POWER is > 1% RTP. This is shown by CTS 3.6.2.1.a.2.a), which states that 110°F is the limit when ≤ 1% RTP. Therefore, the ITS LCO for this limit has been clarified to be at > 1% RTP, and the ACTION has been modified to only require power to be decreased to ≤ 1% RTP in lieu of the CTS 3.6.2.1 Action b to shutdown the unit. Once THERMAL POWER is ≤ 1% RTP, the LCO is met if suppression pool temperature is ≤ 110°F, thus, a shutdown to MODE 3 and MODE 4 is not required, as stated in CTS 3.0.2.	LCO 3.6.2.1.a, 3.6.2.1 ACTION B	3.6.2.1.a.2, 3.6.2.1.a.2.a), 3.6.2.1 Action b
A.3	Moves the requirements in CTS 3.6.2.1.b, CTS 3.6.2.1 Action e, and CTS 4.6.2.1.d, relating to the drywell-to-suppression chamber bypass leakage limit, to ITS 3.6.1.1.	3.6.1.1	3.6.2.1.b, 3.6.2.1 Action e, 4.6.2.1.d

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	3.6.2.2, Suppression Pool Water Level		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.2	3/4.6.2.1, 3/4.5.3
A.2	Deletes the cross references to CTS 3.5.3 and 3.6.2.1, since the format of the ITS does not include providing cross references.	N/A	3.5.3 footnote # 3.6.2.1 footnote #,
A.3	Moves the requirements in CTS 3.5.3.b, 3.5.3 Action b, 4.5.3.1.a.2, and 4.5.3.2, relating to the suppression pool level requirements while in MODES 4 and 5, to ITS 3.5.2.	3.5.2 LCO	3.5.3.b, 3.5.3 Action b, 4.5.3.1.a.2, 4.5.3.2
	3.6.2.3, RHR Suppression Pool Cooling		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.3	3/4.6.2.3
A.2	~~Not used~~ <INSERT A.2>	3.6.2.3 ACTION C	3.6.2.3 Action b, footnote *
A.3	The CTS requires verification that each suppression pool cooling valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. The CTS recognizes that the suppression pool cooling function is manually actuated and is interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In the ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. Thus, for RHR suppression pool cooling, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for this systems' valves to be in the non-accident position and still be considered OPERABLE. In addition, since there are no automatic valves for the suppression pool cooling mode, the reference to check automatic valves has been deleted.	SR 3.6.2.3.1	4.6.2.3.b
	3.6.2.4, RHR Suppression Pool Spray		

NRC See comment 4

INSERT A.2 (LCO 3.6.2.3 LaSalle)

Deletes CTS 3.6.2.3 Action b, footnote *, which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4, since it provides unnecessary duplication of the ACTIONS required by ITS 3.4.9.

A.1	Editorial changes, reformatting, and revised numbering.	3.6.2.4	3/4.6.2.2
A.2	Not used. < INSERT A.2 >	3.6.2.4 ACTION C	3.6.2.2 Action b, footnote *
A.3	The CTS requires verification that each suppression pool spray valve in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position. The CTS recognizes that the suppression pool spray function is manually actuated and is interpreted that "in the correct position" allows the valves to be in a non-accident position provided they can be realigned to the correct position. In the ITS, the words "in the correct position" mean that the valves must be in the accident position, unless they can be automatically aligned on an accident signal. Thus, for RHR suppression pool spray, the additional words "or can be aligned to the correct position" have been added to clarify that it is permissible for this systems' valves to be in the non-accident position and still be considered OPERABLE. In addition, since there are no automatic valves for the suppression pool spray mode, the reference to check automatic valves has been deleted.	SR 3.6.2.4.1	4.6.2.2.a
	3.6.3.1, Primary Containment Hydrogen Recombiners		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.3.1	3/4.6.6.1
	3.6.3.2, Primary Containment Oxygen Concentration		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.3.2	3/4.6.6.2
A.2	Deletes the cross reference to CTS 3.10.5, since the format of the ITS does not include providing cross references.	N/A	3.6.6.2 Applicability footnote *
A.3	Revises the presentation of the ACTIONS to be consistent with the Applicability. The ITS only requires shutdown to 15% RTP. Below 15% RTP, the Applicability is exited and the ACTIONS are no longer required.	3.6.3.2 ACTION B	3.6.6.2 Applicability and Action

NRC See comment 4

INSERT A.2 (LCO 3.6.2.4 LaSalle)

Deletes CTS 3.6.2.2 Action b, footnote *, which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4, since it provides unnecessary duplication of the ACTIONS required by ITS 3.4.9.

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A.4	Deletes CTS 4.6.6.2, which requires oxygen concentration in primary containment to be verified within limit prior to entering the Applicability of CTS 3.6.6.2 (within 24 hours after THERMAL POWER is greater than 15% of RTP). This requirement does not need to be repeated as a separate Surveillance Frequency.	SR 3.0.4	4.0.4, 4.6.6.2
	3.6.4.1, Secondary Containment		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.1	3/4.6.5.1
A.2	Replaces the definition of SECONDARY CONTAINMENT INTEGRITY and the references to it in CTS 3/4.6.5.1 with the requirement for secondary containment to be OPERABLE, since all the requirements are specifically addressed in the ITS and associated Bases for the Secondary Containment (3.6.4.1), the Secondary Containment Isolation Valves (3.6.4.2), and Standby Gas Treatment System (3.6.4.3).	3.6.4.1, 3.6.4.2, 3.6.4.3	3/4.6.5.1
A.3	Modifies the requirement to verify that one door in each access is closed to require one door in each access opening to be closed. The LaSalle 1 and 2 design includes more than two doors on some of the accesses, and the current LaSalle 1 and 2 interpretation of this requirement is that for these accesses, there are multiple access openings, and that each access opening must have at least one door closed.	SR 3.6.4.1.2	4.6.5.1.b.1
A.4	Moves the requirements in CTS 4.6.5.1.b.2, relating to the position of secondary containment isolation valves, to ITS 3.6.4.2.	3.6.4.2	4.6.5.1.b.2
	3.6.4.2, Secondary Containment Isolation Valves		
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.2	4.6.5.1.b.2 ~~3/4.6.5.1~~, 3/4.6.5.~~2,~~
A.2	Adds ITS ACTIONS Note "Separate Condition entry is allowed for each penetration flow path." Additionally, adds ITS ACTIONS Note that facilitates the use and understanding of the intent to consider the affect of inoperable isolation valves on other systems. For a system made inoperable by inoperable SCIVs the applicable ACTIONS for that system also apply. This is consistent with the intent of the CTS.	3.6.4.2 ACTIONS Notes 2 and 3	3.6.5.2 Actions

NRC
More accurate reference.

A.3	The CTS 3.6.5.2 Action does not specify penetrations with one or two isolation valves. However, ITS 3.6.4.2 Condition A only applies if one valve in a penetration is inoperable. This inherently ensures maintaining "at least one isolation valve OPERABLE."	3.6.4.2 Condition A	3.6.5.2 Action
A.4	The revised presentation of the CTS 3.6.5.2 Action does not explicitly detail options to "restore...to OPERABLE status," since this action is always an option, and is implied in all Actions.	LCO 3.0.2	3.6.5.2 Action
3.6.4.3, Standby Gas Treatment System			
A.1	Editorial changes, reformatting, and revised numbering.	3.6.4.3	3/4.6.5.3
A.2	Deletes the footnote that states the normal or emergency power source may be inoperable for each SGT subsystem since it duplicative of the ITS definition of OPERABLE-OPERABILITY.	1.1 Definition OPERABLE-OPERABILITY	LCO 3.6.5.3 footnote #
A.3	Adds an ACTION that directs entry into LCO 3.0.3 if both SGT subsystems are inoperable in MODE 1, 2, or 3, consistent with the intent of the CTS.	3.6.4.3 ACTION D	3.0.3, 3.6.5.3 Actions
A.4	Revises the terminology associated with the heater status from "OPERABLE" to "operating," since it is necessary for the heaters to actually operate to reduce moisture from the adsorbers and HEPA filters.	SR 3.6.4.3.1	4.6.5.3.a
A.5	Divides CTS 4.6.5.3.d.2, which verifies each SGT subsystem starts on the appropriate automatic initiation signals, into two Surveillances. The majority of the instrumentation testing will be performed in SR 3.3.6.2.4, and the actual system functional test portion, which will ensure the SGT System starts on an initiation signal, will be performed as SR 3.6.4.3.3.	SR 3.3.6.2.4, SR 3.6.4.3.3	4.6.5.3.d.2

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DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.7.1, Residual Heat Removal Service Water System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.1	3/4.7.1.1
A.2	Deletes the requirement which allows the unit to maintain reactor coolant temperature as low as practical in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4.	N/A	3/4.7.1.1 footnote *
A.3	Adds "or can be aligned to the correct position" in SR 3.7.1.1 to clarify that it is permissible for the RHR service water systems' valves to be in the non-accident position and still be considered OPERABLE.	SR 3.7.1.1	4.7.1.1
3.7.2, Diesel Generator Cooling Water System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.2	3/4.7.1.2
A.2	Adds ITS Note, "Separate Condition entry is allowed for each DGCW subsystem," which is consistent with the intent of the CTS.	3.7.2 ACTIONS Note	3.7.1.2 Action
A.3	Deletes CTS 3.7.1.2 Action statement referencing CTS 3.8.1.1, since the statement only serves as a cross reference.	N/A	3.7.1.2 Action
3.7.3, Ultimate Heat Sink			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.3	3/4.7.1.3
3.7.4, Control Room Area Filtration System			
A.1	Editorial changes, reformatting, and revised numbering.	3.7.4	3/4.7.2

A.2	Deletes the footnote that states the normal or emergency power source may be inoperable for the CRAF subsystem in MODES or other specified condition other than MODE 1, 2, or 3, since it duplicative of the ITS definition of OPERABILITY.	1.1 OPERABLE-OPERABILITY definition	LCO 3.7.2 footnote #
A.3	Adds an ACTION to clarify intent of current requirements by directing entry into LCO 3.0.3 if both CRAF subsystems are inoperable in MODE 1, 2, or 3.	3.7.4 ACTION D	3.7.2 Actions
A.4	Enhances presentation by requiring actions to be immediately initiated to suspend OPDRVs versus the CTS action of immediately "suspend...operations with a potential for draining the reactor vessel."	3.7.4 ACTION E	3.7.2 Action b
	3.7.5, Control Room Area Ventilation Air Conditioning System		
NONE	NONE	NONE	NONE
	3.7.6, Main Condenser Offgas		
A.1	Editorial changes, reformatting, and revised numbering.	3.7.6	3/4.11.2.2
A.2	Clarifies the CTS by adding to the LCO the 30 minute decay period for the radioactivity rate of noble gases downstream of the recombiner to be ≤ 340,000 microcuries/second. This is appropriate because the accident analysis that assumes the radioactivity rate of 340,000 microcuries/second also assumes that the radioactivity rate is after a 30 minute decay period.	LCO 3.7.6	LCO 3.11.2.2
	3.7.7, Main Turbine Bypass System		
A.1	Editorial changes, reformatting, and revised numbering.	3.7.7	3/4.7.10
A.2	Adds an LCO option has been added to permit a MCPR penalty to be applied in lieu of maintaining the Main Turbine Bypass System OPERABLE, consistent with the current licensing basis as indicated in CTS 3.7.10, Actions 1.a)2) and 2.a).	LCO 3.7.7	3.7.10 Actions 1.a)2) and 2.a)

A.3	Deletes "OPERATIONAL CONDITION 1" from the Applicability of "OPERATIONAL CONDITION 1 when THERMAL POWER is 25% or more of RATED THERMAL POWER," since with THERMAL POWER ≥ 25% RTP, the unit will always be in MODE 1.	N/A	3.7.10
A.4	Adds an option to restore the Main Turbine Bypass System to OPERABLE status, since this is always an option.	3.7.7 ACTION A	N/A
	3.7.8, Spent Fuel Storage Pool Water Level		
A.1	Editorial changes, reformatting, and revised numbering.	3.7.8	3/4.9.9
A.2	Clarifies that the Applicability is limited to circumstances when irradiated fuel assemblies are being moved in the spent fuel storage pool or when new fuel is being moved in the spent fuel storage pool with irradiated fuel assemblies in the spent fuel storage pool. This is acceptable since the purpose of the LCO is to ensure sufficient water is above the irradiated fuel assemblies to meet the assumptions of a fuel handling accident.	LCO 3.7.8	LCO 3.9.9
A.3	The CTS requirement establishes the top of active fuel as the reference point for measuring spent fuel pool depth, the ITS requirement uses the top of the fuel bundle - which is located at the top of the fuel bundle bail handle. Thus, the ITS provides an equivalent requirement, that is stated in terms of the depth of water that shall be maintained over the "irradiated fuel assemblies" seated in the spent fuel pool storage racks.	LCO 3.7.8	LCO 3.9.9
	Current Specification 3/4.7.4, Sealed Source Contamination		
NONE	NONE	NONE	NONE
	Current Specification 3/4.7.7, Area Temperature Monitoring		
NONE	NONE	NONE	NONE

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Current Specification 3/4.7.8, Structural Integrity of Class 1 Structures			
NONE	NONE	NONE	NONE
Current Specification 3/4.7.9, Snubbers			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC Sources - Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.1	3/4.8.1.1, LCO 3.0.5, LCO 3.8.2.1.d, 3.8.2.1 Action c
A.2	Moves the details in CTS LCO 3.8.1.1.b.1 and LCO 3.8.1.1.b.2 relating to the required day tank level to ITS SR 3.8.1.4.	SR 3.8.1.4	LCO 3.8.1.1.b.1, LCO 3.8.1.1.b.2
A.3	Moves the technical content of the fuel oil storage and starting air requirements in CTS LCO 3.8.1.1.b.1.b), LCO 3.8.1.1.b.2, 4.8.1.1.2.a.2, 4.8.1.1.2.a.7, 4.8.1.1.2.c, and 4.8.1.1.2.f to ITS 3.8.3.	3.8.3	LCO 3.8.1.1.b.1.b), LCO 3.8.1.1.b.2, 4.8.1.1.2.a.2, 4.8.1.1.2.a.7, 4.8.1.1.2.c, 4.8.1.1.2.f
A.4	Adds two Notes to the ITS Applicability. In the event the HPCS System is inoperable, a Note allows the Division 3 DG to be inoperable. In addition, certain safety related components (e.g., one standby gas treatment subsystem) are powered from Division 2 of the opposite unit. In the event all these required safety related components powered from the opposite unit are inoperable, a second Note allows the opposite unit Division 2 AC sources to not be required to be OPERABLE. The effect is to continue to allow the ACTIONS to be applied to other AC sources inoperabilities, without the complexity of also having the AC Sources Specification address concurrent Division 3 DG or opposite unit Division 2 AC source inoperability.	3.8.1 Applicability Notes 1 and 2	N/A
A.5	Deletes the statement in footnote * to CTS LCO 3.8.1.1.b, which states that CTS 4.8.1.1.1.a is not required to be performed when the common DG is inoperable for maintenance, modification, and/or Surveillance testing, since there are two separate ACTIONS in the ITS, one for when the common DG is inoperable for the above listed reasons and one for when it is inoperable for other reasons, and each ITS ACTION provides the proper requirements with respect to performing CTS 4.8.1.1.1.a.	N/A	LCO 3.8.1.1.b, footnote *

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SECTION 3.8 - ELECTRICAL POWER SYSTEMS

A.6	The CTS requires the DG to reject the single largest load while maintaining the engine speed increase ≤ 75% of the difference between nominal speed and the overspeed trip setpoint or ≤ 15% of the nominal speed, whichever is less. These two possible values for the overspeed trip point are fixed by the design of the DG unit. The appropriate value (i.e., the most limiting, which is 66.7 Hz) is presented in ITS SR 3.8.1.9.	SR 3.8.1.9	4.8.1.1.2.d.2
A.7	In the event AC Sources are inoperable such that a distribution subsystem were inoperable, ITS LCO 3.0.6 would allow taking only the AC Sources ACTIONS; taking exception to complying with the AC Distribution System ACTIONS. Since the AC Sources ACTIONS may not be sufficiently conservative in this event (an entire division may be without power), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a division.	3.8.1 ACTION E Note	3.8.1.1 Actions
A.8	Deletes references to "take the ACTION required by..." in CTS 3.8.1.1 Actions d and g, since the format of the ITS does not include providing "cross references." The individual Specifications adequately prescribe the Required Actions for inoperable systems, subsystems, trains, components, and devices without such references.	N/A	3.8.1.1 Actions d and g
A.9	Not ~~used.~~ <INSERT A.9>	N/A	3.8.1.1 Actions i, j, k, and l
A.10	With three or more required AC sources inoperable (e.g., two offsite circuits and one DG), ACTIONS would be taken in accordance with ITS 3.8.1, and ITS LCO 3.0.3 entry conditions would not be met. Since CTS 3.8.1.1 does not provide Actions for these conditions, ITS 3.8.1 ACTION H is added to direct entry into ITS LCO 3.0.3, to preserve the existing intent for CTS 3.0.3 entry.	3.8.1 ACTION H	3.8.1.1 Actions
A.11	CTS 4.8.1.1.2.a.4, 4.8.1.1.2.a.5, 4.8.1.1.2.d.2, 4.8.1.1.2.d.3, and 4.8.1.1.2.d.8 specify requirements for testing of a DG (0 diesel generator) that is common to both units. Therefore, a Note is added to the applicable ITS SRs to clearly state the current plant interpretation, i.e., a single test of the common DG at the specified Frequency will satisfy the Surveillance for both units.	SR 3.8.1.2 Note 3, SR 3.8.1.3 Note 5, SR 3.8.1.7 Note 2, SR 3.8.1.9 Note 2, SR 3.8.1.10 Note 2, SR 3.8.1.14 Note 4, SR 3.8.1.15 Note 3	4.8.1.1.2.a.4, 4.8.1.1.2.a.5, 4.8.1.1.2.d.2, 4.8.1.1.2.d.3, 4.8.1.1.2.d.8

INSERT A.9 (LCO 3.8.1 LaSalle)

CTS Actions i, j, k, and l specify which ACTION requirements apply with various combinations of AC source inoperabilities. Section 1.3 of ITS states that when situations are discovered that require entry into more than one Condition at a time, the Required Actions for each Condition must be performed within the associated Completion Time. In addition, to avoid the misinterpretation tht LCO 3.0.3 (CTS 3.0.3) must be entered if Actions are not specifically defined for multiple combinations of inoperabilities, the Bases of ITS LCO 3.0.3 state that LCO 3.0.3 is applicable when, "...no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit." As a result, it is not necessary to provide specific actions to reference other actions. Therefore, CTS 3.8.1.1 Actions i, j, k, and l are not included as separate ITS 3.8.1 ACTIONS.

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

A.12	CTS 4.8.1.1.2 footnote *, which allows DG engine pre-lubrication when starting diesel generators, is referenced by numerous CTS Surveillance Requirements that define requirements for operating DGs. Therefore, the Note has been deleted from these Surveillance Requirements.	N/A	footnote * to 4.8.1.1.d.2, 4.8.1.1.d.3, 4.8.1.1.2.d.8, 4.8.1.1.2.d.9, 4.8.1.1.2.d.10, 4.8.1.1.2.d.11
A.13	CTS 4.8.1.1.2.d.7 requires a verification that all automatic trips except engine overspeed, generator differential current, and emergency manual stop are automatically bypassed on an ECCS actuation signal. The emergency manual stop is not an automatic DG trip. This trip manually trips the fuel racks, and must be manually initiated by an operator. Therefore, this trip is not included in the ITS.	N/A	4.8.1.1.2.d.7
A.14	CTS 4.8.1.1.2.d.12 references load sequence timers. LaSalle 1 and 2 design does not include load sequencer timers. Specific safety related loads are sequenced onto the emergency busses by time delay relays. As such, the wording of ITS SR 3.8.1.18 has been modified to reference time delay relays.	SR 3.8.1.18	4.8.1.1.2.d.12
A.15	If CTS 4.8.1.1.2.d.8 (the DG restart test portion) fails after the performance of the 24 hour DG load test, CTS 4.8.1.1.2.d.8 footnote ** allows the diesel generator to be operated at 2600 kW for 2 hours or until operating temperature has stabilized. ITS SR 3.8.1.15 Note 1 only includes a requirement that load must be ≥ 2400 kW and ≤ 2600 kW for 2 hours within 5 minutes of starting the SR. Operation ≥ 2400 kW and ≤ 2600 kW for 2 hours has been the accepted manufacturer's recommendation to achieve hot conditions (i.e., a stabilized operating temperature).	SR 3.8.1.15 Note 1	4.8.1.1.2.d.8 footnote **
A.16	CTS 3.0.5 has been incorporated into the ACTIONS of ITS 3.8.1. ITS 3.8.1 is only applicable in MODES 1, 2, and 3. Therefore, the statement in CTS 3.0.5, which states that the Specification is not applicable in Operational Condition (MODE) 4 or 5, is no longer necessary and is deleted.	N/A	3.0.5

A.17	CTS 3.8.2.1.d requires the opposite unit Division 1 4.16 kV bus and cross-tie breaker be OPERABLE and CTS 3.8.2.1 Action c provides a 7 day restoration time if the opposite unit Division 1 4.16 kV bus or cross-tie breaker is inoperable. However, the bus and breaker are also part of the alternate offsite circuit pathway and only a 72 hour restoration time is allowed in CTS 3.8.1.1, Action a. In ITS, this bus and cross-tie breaker are only identified in the ITS 3.8.1 Bases as part of the alternate offsite circuit pathway to the given unit. This change simply clarifies that this requirement is associated with the ITS AC Sources Specifications.	LCO 3.8.1.a, 3.8.1 ACTION A	LCO 3.8.2.1.d, 3.8.2.1 Action c, 3.8.1.1 Action a
A.18	Two Notes have been added to the Surveillance Requirements to clearly define the applicability of Surveillances to both units. An additional Surveillance has also been added to ensure the opposite unit's power sources are properly tested.	Surveillance Requirement Table Notes 1 and 2, SR 3.8.1.21	4.8.1.1.1, 4.8.1.1.2
A.19	The requirements that the auto-connected emergency loads be energized "through the load sequencer" for Division 1 and 2 is changed to "including through delay relays, where applicable", since the LaSalle design does not include load sequencers, but includes time delay relays.	SR 3.8.1.19	4.8.1.1.2.d.6.a) 2)
A.20	The CTS 4.8.1.1.1.b and 4.8.1.1.2.d existing limitation on 18-month surveillances to perform them "during shutdown" is more specifically presented in the proposed Surveillances. Each proposed SR contains a specific Note limiting the performance in MODES 1 and 2. Additionally, the ITS Note clearly presents the allowance of the current practice of taking credit for unplanned events, provided the necessary data is obtained.	SR 3.8.1.8, SR 3.8.1.9, SR 3.8.1.10, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.13, SR 3.8.1.14, SR 3.8.1.16, (1) SR 3.8.1 17, SR 3.8.1.18, and SR 3.8.1.19	4.8.1.1.1.b, 4.8.1.1.2.d
	3.8.2, AC Sources - Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.2	3/4.8.1.2

A.2	Moves the details relating to the required day tank level in CTS LCO 3.8.1.2.b.1.a) and LCO 3.8.1.2.b.2 to ITS SR 3.8.2.1.	SR 3.8.2.1	LCO 3.8.1.2.b.1.a), LCO 3.8.1.2.b.2
A.3	Moves the technical content of the fuel oil storage requirements in CTS LCO 3.8.1.2.b.1.b) and LCO 3.8.1.2.b.2, and certain requirements of CTS SR 4.8.1.2 to ITS 3.8.3.	3.8.3	LCO 3.8.1.2.b.1.b), LCO 3.8.1.2.b.2, 4.8.1.2
A.4	In the event AC Sources are inoperable such that a distribution subsystem were inoperable, ITS LCO 3.0.6 would allow taking only the AC Sources ACTIONS; taking exception to complying with the AC Distribution System ACTIONS. Since the AC Sources ACTIONS may not be sufficiently conservative in this event (e.g., RHR-SDC could be inoperable), specific direction to take appropriate ACTIONS for the Distribution System is added when there is no power for a required division.	3.8.2 ACTION A Note	3.8.1.2 Actions
A.5	Deletes the references in CTS 3.8.1.2 Action b to "take the ACTION required by Specification 3.5.2 and 3.5.3" and in CTS 3.8.1.2 Action c to "take the ACTION required by Specifications 3.6.5.3 and 3.7.2," since the format of the ITS does not include providing "cross references." ITS 3.5.2, 3.6.4.3, 3.7.4, and 3.7.5 adequately prescribe the Required Actions for an inoperable HPCS System, SGT subsystem, control room area filtration subsystem, or control room area ventilation air conditioning subsystem, respectively, without such references.	N/A	3.8.1.2 Action b, 3.8.1.2 Action c
A.6	Deletes from CTS 4.8.1.2 the reference to CTS 4.8.1.1.3, since CTS 4.8.1.1.3 was deleted in Amendments 109 (Unit 1) and 94 (Unit 2).	N/A	4.8.1.2
A.7	For clarity, adds an exception to CTS 4.8.1.1.2.e (ITS SR 3.8.1.20), which is consistent with the intent of the CTS. This Surveillance is currently not required since it ensures all the DGs are OPERABLE (and no more than two unit DGs are required while in MODES 4 and 5 and handling irradiated fuel assemblies in the secondary containment). In addition, two other exceptions have been included for clarity. CTS 4.8.1.1.1.b (ITS SR 3.8.1.8) is excluded since only one offsite circuit is required to be OPERABLE. CTS 4.8.1.1.2.d.11 (ITS SR 3.8.1.17), the requirement to verify the DG capability to return to the ready-to-load condition when in the test mode and an ECCS initiation signal is present, is also excluded since the required DG is not required by CTS to undergo periods of being synchronized to the offsite circuit.	SR 3.8.2.1	4.8.1.2

	3.8.3, Diesel Fuel Oil and Starting Air		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.3	3/4.8.1.1, 3/4.8.1.2
A.2	The fuel oil and starting air requirements of CTS 3/4.8.1.1 and 3/4.8.1.2 have been moved to a new ITS LCO 3.8.3. An LCO Statement has been provided requiring fuel oil storage and starting air. The Applicability of this new LCO is "when associated DG is required to be OPERABLE." This covers the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements of CTS 3/4.8.1.1 and 3/4.8.1.2.	3.8.3	3/4.8.1.1, 3/4.8.1.2
A.3	Moves the details relating to the required storage tank levels in CTS 3.8.1.1.b.1.b), CTS 3.8.1.1.b.2, CTS 3.8.1.2.b.1.b), and CTS 3.8.1.2.b.2 to SR 3.8.3.1.	SR 3.8.3.1	3.8.1.1.b.1.b), 3.8.1.1.b.2, 3.8.1.2.b.1.b), 3.8.1.2.b.2
A.4	Moves the technical content of CTS 4.8.1.1.2.c, which provides the DG fuel oil sampling requirements, to ITS 5.5.10. In addition, adds a Surveillance Requirement to clarify that the tests of the Diesel Fuel Oil Testing Program must also be completed and passed for determining Operability of the DGs.	SR 3.8.3.1, 5.5.10	4.8.1.1.2.c
	3.8.4, DC Sources - Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.4	3/4.8.2.3, 4.7.3.d
A.2	The battery hardware components (battery and charger) of CTS 3.8.2.3 remain in the DC Sources LCO (ITS 3.8.4). Therefore, a new LCO statement has been provided reflecting this. The ITS presents the DC distribution in a separate LCO (ITS 3.8.7), moves the technical content of CTS Table 4.8.2.3.2-1 (including CTS 4.8.2.3.2.a.1 and 4.8.2.3.2.b.1), the battery cell parameter requirements and CTS 4.8.2.3.2.b.3, the average electrolyte temperature requirements to ITS 3.8.6.	3.8.4, 3.8.6, 3.8.7	3.8.2.3, Table 4.8.2.3.2-1, 4.8.2.3.2.a.1, 4.8.2.3.2.b.1, 4.8.23.2.b.3

A.3	Deletes the reference in CTS 3.8.2.3 Action b to "take the ACTION required by Specification 3.5.1," since the format of the ITS does not include providing "cross references." ITS 3.5.1 adequately prescribes the Required Actions for an inoperable ECCS without such references.	N/A	3.8.2.3 Action b
A.4	CTS 4.8.2.3.2.c.4 requires performance of a battery charger capacity test to verify that the 125 V 1E battery chargers will supply a load equal to the manufacturer's rating for the test duration. Since the battery charger rating does not change, the appropriate values (amps and voltage) have been included in ITS SR 3.8.4.6.	SR 3.8.4.6	4.8.2.3.2.c.4
A.5	Two Notes have been added to the Surveillance Requirements to clearly define the applicability of Surveillances to both units. An additional Surveillance has also been added to ensure the opposite unit's power sources are properly tested.	Surveillance Requirement Table Notes 1 and 2, SR 3.8.4.9	4.8.2.3.2
A.6	The Division 1 250V DC battery and battery charger have been moved from the RCIC Specification (CTS 3/4.7.3) to the DC Sources Specification (proposed ITS 3.8.4). This requirement is covered by the ITS 3.8.4 LCO statement, which requires the Division 1 DC electrical power subsystem to be OPERABLE. In CTS 3/4.7.3, if the Division 1 250V DC battery or charger is inoperable, RCIC and one of the RCIC PCIVs would be considered inoperable and the appropriate ACTIONS would be entered. Therefore, new ITS 3.8.4 ACTION C is also being added to declare RCIC and the RCIC PCIVs (i.e., the associated supported features) inoperable immediately when the Division 1 250V DC battery is inoperable.	LCO 3.8.4, 3.8.4 ACTION C	LCO 3.7.3, 3.7.3 Action
A.7	CTS 4.7.3.d.1.d) requires the overall battery voltage to be verified ≥ 250V every 7 days. ITS SR 3.8.4.1 adds a requirement that the battery be verified while on float charge, since this is the current manner in which the battery is verified.	SR 3.8.4.1	4.7.3.d.1.d)
	3.8.5, DC Sources - Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.5	3/4.8.2.4
A.2	The battery hardware components (battery and charger) of CTS 3.8.2.4 remain in the DC Sources LCO (ITS 3.8.5). Therefore, a new LCO statement has been provided reflecting this. The ITS presents the DC distribution in a separate LCO (ITS 3.8.8).	3.8.5, 3.8.8	3.8.2.4

A.3	Deletes the references in CTS 3.8.2.4 Action b to "take the ACTION required by Specification 3.5.2 and 3.5.3" and in CTS 3.8.2.4 Action d to "take the ACTION required by Specifications 3.6.5.3 and 3.7.2," since the format of the ITS does not include providing "cross references." ITS 3.5.2, 3.6.4.3, 3.7.4, and 3.7.5 adequately prescribe the Required Actions for an inoperable HPCS System, SGT subsystem, control room area filtration subsystem, or control room area ventilation air conditioning subsystem, respectively, without such references.	N/A	3.8.2.4 Action b, 3.8.2.4 Action d
A.4	In lieu of declaring the standby gas treatment (SGT) subsystem and control room and auxiliary electric equipment room emergency filtration subsystem inoperable and taking the Actions of the appropriate LCO as required by CTS 3.8.2.4 Action d, three new Required Actions have been provided for when the opposite unit's Division 2 DC source is inoperable. ITS 3.8.5 Required Actions B.2.1, B.2.2, and B.2.3 require suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and OPDRVs, and are the same as the Actions found in the individual System Specifications when both SGT subsystems or both control room auxiliary electric equipment room emergency filtration subsystems are inoperable.	3.8.5 Required Actions B.2.1, B.2.2, and B.2.3	N/A
	3.8.6, Battery Cell Parameters		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.6	3/4.8.2.3, 3/4.8.2.4, 4.7.3.d
A.2	Presents the 125 VDC battery cell parameters limits in a separate LCO with appropriate ACTIONS and SRs. CTS 4.8.2.4.2 is being deleted since its provisions only reference requirements in CTS 4.8.2.3.2, which are contained in ITS 3.8.6.	3.8.6	3/4.8.2.3, 3/4.8.2.4
A.3	Applicability presented as "when associated DC electrical power subsystem is required to be OPERABLE," covering the current MODES 1, 2, 3, 4, and 5 and fuel handling requirements (actually more restrictive for the DC power subsystems since more than one of the batteries may be required in MODES 4 and 5 since the DC sources Applicability has been changed - see DOC M.1 for ITS 3.8.5).	3.8.6 Applicability	3.8.2.3 Applicability, 3.8.2.4 Applicability
A.4	Adds ITS ACTIONS Note "Separate condition entry is allowed for each battery," which is consistent with the intent of the CTS.	3.8.6 ACTIONS Note	3.8.2.3 Actions, 3.8.2.4 Actions

A.5	Adds a specific Condition to explicitly require the battery to be declared inoperable when the temperature is not within limit or when Category A or B limits have not been restored within the applicable time, since this is the obvious intent of the CTS.	3.8.6 ACTION B	3.8.2.3 Actions, 3.8.2.4 Actions, Table 4.8.2.3.2-1 Notes
A.6	Presents the 250 VDC battery cell parameters limits in a separate LCO. In addition, the Applicability is presented as "when associated DC electrical power subsystem is required to be OPERABLE," covering the current RCIC System Applicability of MODES 1, 2, and 3 with reactor steam dome pressure greater than 150 psig (actually more restrictive for the 250 VDC electrical power subsystem since the 250 VDC electrical power subsystem Applicability has been changed - see DOC M.1 for ITS 3.8.4).	LCO 3.8.6, 3.8.6 Applicability	4.7.3.d
	3.8.7, Distribution Systems - Operating		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.7	3/4.8.2.1, 3/4.8.2.3, 4.7.3.d
A.2	CTS LCO 3.8.2.1.d requires the opposite unit Division 1 4.16 kV bus (141Y and 241Y) and supply breaker (1414 and 2414) to be OPERABLE. These buses/breakers provide the method to tie the alternate offsite circuit to the given unit. Therefore, this requirement, including the portion of CTS 3.8.2.1 Action c concerning the opposite unit Division 1 buses/breakers is being moved to ITS 3.8.1.	3.8.1	LCO 3.8.2.1.d, 3.8.2.1 Action c
A.3	Deletes the reference in CTS 3.8.2.1 Action b and 3.8.2.3 Action b to "take the ACTION required by Specification 3.5.1," since the format of the ITS does not include providing "cross references." ITS 3.5.1 adequately prescribes the Required Actions for an inoperable HPCS System without such references.	N/A	3.8.2.1 Action b, 3.8.2.3 Action b
A.4	Moves the 250 VDC motor control center requirements RCIC Specification (CTS 3/4.7.3) to the Distribution Systems – Operating Specification (ITS 3.8.7). This requirement is covered by the ITS LCO 3.8.7, which requires the Division 1 DC distribution subsystems to be OPERABLE. In addition, ITS 3.8.7 ACTION F is also being added to declare RCIC and the RCIC PCIVs (i.e, the associated supported features) inoperable immediately when the 250 VDC motor control center is inoperable, consistent with the current requirements.	LCO 3.8.7, 3.8.7 ACTION F	3/4.7.3

A.5	Adds a clarification to the requirements in CTS 3.8.2.1 for opposite unit Division 2 AC electrical power distribution buses and CTS 3.8.2.3 for opposite unit Division 2 DC electrical power distribution buses, to describe the equipment required to be supported by the opposite unit Division 2 AC and DC electrical power distribution buses, i.e., equipment required to be OPERABLE by LCO 3.6.3.1, "Primary Containment Hydrogen Recombiners," LCO 3.6.4.3, "Standby Gas Treatment (SGT) System, LCO 3.7.4, "Control Room Area Filtration (CRAF) System," LCO 3.7.5, "Control Room Area Ventilation Air Conditioning (AC) System, and LCO 3.8.1, "AC Sources – Operating.	LCO 3.8.7.d	LCO 3.8.2.1, LCO 3.8.2.3
A.6	A Note has been added to enter the applicable Conditions and Required Actions of LCO 3.8.1 when Condition C results in the inoperability of a required offsite circuit. The opposite unit Division 2 distribution subsystem can be part of the circuit path for the alternate offsite circuit. Due to addition of ITS LCO 3.0.6 the Note is needed to ensure the ACTIONS of LCO 3.8.1 are entered when an offsite circuit is also rendered inoperable.	3.8.7 Required Action C.1	3.8.2.3 Action c
	3.8.8, Distribution Systems - Shutdown		
A.1	Editorial changes, reformatting, and revised numbering.	3.8.8	3/4.8.2.2, 3/4.8.2.4
A.2	Deletes the references in CTS 3.8.2.2 Action b and 3.8.2.4 Action b to "take the ACTION required by Specifications 3.5.2 and 3.5.3," and in CTS 3.8.2.2 Action c and 3.8.2.4 Action d to "take the ACTION required by Specifications 3.6.5.3 and 3.7.2," since the format of the ITS does not include providing "cross references." ITS 3.5.2, 3.6.4.3, 3.7.4, 3.7.5, and 3.5.3 adequately prescribe the Required Actions for an inoperable HPCS System, SGT subsystem, control room area filtration subsystem, or control room area ventilation air conditioning subsystem, respectively without such references.	N/A	3.8.2.2 Actions b and c, 3.8.2.4 Actions b and d

A.3	In lieu of declaring the standby gas treatment subsystem and control room and auxiliary electric equipment room emergency filtration subsystem inoperable and taking the Actions of the appropriate LCO as required by CTS 3.8.2.2 Action c and 3.8.2.4 Action d, three new Required Actions have been provided for when the opposite unit's Division 2 DC distribution subsystem is inoperable. ITS 3.8.8 Required Actions A.2.1, A.2.2, and A.2.3 require suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and OPDRVs, and are the same as the Actions found in the individual System Specifications.	3.8.8 Required Actions A.2.1, A.2.2, and A.2.3	N/A
Current Specification 3/4.8.3.1, AC Circuits Inside Primary Containment			
NONE	NONE	NONE	NONE
Current Specification 3/4.8.3.2, Primary Containment Penetration Conductor Overcurrent Protective Devices			
NONE	NONE	NONE	NONE
Current Specification 3/4.8.3.3, Motor Operated Valves Thermal Overload Protection			
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.1, Refueling Equipment Interlocks		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.1	3/4.9.1
A.2	Moves the Refuel Position One-Rod-Out Interlock requirements to ITS 3.9.2.	3.9.2	3/4.9.1
A.3	Since one-rod-out interlock requirements are moved to ITS 3.9.2, restrictions on equipment to be used during CORE ALTERATIONS in ITS 3.9.1 are rewritten, where the Applicability addresses the only CORE ALTERATIONS remaining, i.e., fuel movement.	3.9.1	LCO 3.9.1.b
A.4	Lists each actual refuel platform hoist in the Surveillance Requirement of ITS SR 3.9.1.1, versus the CTS requirement for the refuel platform "hoists" fuel loaded interlocks be Operable.	SR 3.9.1.1	LCO 3.9.1.b.3
A.5	Changed the Applicability to specify "during in-vessel fuel movement...", as currently found in CTS 3.9.1.b. well as specifying the equipment being used "...with equipment associated with the interlocks..."	LCO 3.9.1	3.9.1
A.6	Deletes Applicability footnote that provides a cross reference to CTS 3.10.1 and 3.10.3, since the format of the ITS does not include providing cross references.	N/A	3.9.1 footnote *
A.7	Deletes the Applicability footnote that states that the reactor shall be maintained in Operational Condition 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since this equipment is an explicit part of the definition of MODE 5.	N/A	3.9.1 footnote #
A.8	Moves, to ITS 3.10.1, the allowance in the footnote to place the reactor mode switch in the Run or Startup/Hot Standby position to test switch interlock functions while in MODE 5.	3.10.1	3.9.1 footnote ##
	3.9.2, Refuel Position One-Rod-Out Interlock		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.2	3/4.9.1
A.2	Deletes the requirement that the reactor mode switch shall be in the Shutdown or Refuel position, since it is an explicit part of the definition of MODE 5.	N/A	LCO 3.9.1
A.3	Moves the Refueling Equipment Interlock requirements to ITS 3.9.1.	3.9.1	3/4.9.1

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	The ITS Applicability reflects the current requirements for the one-rod-out interlock to be Operable in MODE 5 with the reactor mode switch in the refuel position and any control rod withdrawn.	3.9.2	LCO 3.9.1.a
A.5	Deletes Applicability footnote that provides a cross reference to CTS 3.10.1 and 3.10.3, since the format of the ITS does not include providing cross references.	N/A	3.9.1 footnote *
A.6	Deletes the Applicability footnote that states that the reactor shall be maintained in Operational Condition 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed, since this equipment is an explicit part of the definition of MODE 5.	N/A	3.9.1 footnote #
A.7	Moves, to ITS 3.10.1, the allowance in the footnote to place the reactor mode switch in the Run or Startup/Hot Standby position to test switch interlock functions while in MODE 5.	3.10.1	3.9.1 footnote ##
	3.9.3, Control Rod Position		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.3	3/4.9.3
A.2	Deletes footnote that provides a cross reference to CTS 3.9.10.1 and 3.9.10.2, since the format of the ITS does not include providing cross references. In addition, the allowances that fuel can be loaded into the core when a rod is withdrawn under control of the reactor mode switch refuel position one-rod-out interlock has been deleted since the interlock will preclude fuel loading with a rod withdrawn.	N/A	LCO 3.9.3, 3.9.3 Action, 4.9.3.a.2
A.3	Deletes Applicability footnote that provides a cross reference to CTS 3.10.3, since the format of the ITS does not include providing cross references.	N/A	3.9.3 footnote **
	3.9.4, Control Rod Position Indication		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.4	3/4.1.3.7

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Deletes footnote that provides a cross reference to CTS 3.9.10.1 and 3.9.10.2, since the format of the ITS does not include providing cross references.	N/A	3.1.3.7 footnote *
A.3	Adds ITS Note "Separate Condition entry is allowed for each required channel," which is consistent with the intent of the CTS.	3.9.4 ACTIONS Note	3.1.3.7 Actions
	3.9.5, Control Rod OPERABILITY - Refueling		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.5	3/4.1.3.5
A.2	Revises the Operational Condition 5 requirements to say "Each withdrawn control rod shall be OPERABLE," since ITS 3.9.5 includes requirements other than accumulator requirements.	3.9.5	3.1.3.5
A.3	Deletes footnote that provides a cross reference to CTS 3.9.10.1 and 3.9.10.2, since the format of the ITS does not include providing cross references.	N/A	3.1.3.5 footnote *
A.4	Deletes the action to disarm the associated directional control valves. During MODE 5 with an accumulator associated with a withdrawn control rod inoperable, the control rod is required to be inserted. Once the control rod is fully inserted, the accumulator is no longer required to be OPERABLE and the entry conditions for the ACTIONS are no longer applicable, thus no additional ACTIONS are required.	N/A	3.1.3.5 Action b.1
A.5	Moves, to ITS 3.10.7, the requirements for when more than one control rod is withdrawn with the associated scram accumulators inoperable or no control rod drive pump operating.	3.10.7	3.1.3.7 Action b.2
A.6	Deletes "unless the control rod is inserted and disarmed or scrammed," since stating the conditions for an exception to performance of the accumulator Surveillance that are equivalent to the Applicability of the LCO is unnecessary.	N/A	4.1.3.5.a
	3.9.6, RPV Water Level - Irradiated Fuel		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.6	3/4.9.8

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.2	Moves, to ITS 3.9.7, the requirements for handling new fuel assemblies and control rods.	3.9.7	3/4.9.8
A.3	Deletes "while in OPERATIONAL CONDITION 5" from the Applicability since the Specification deals only with handling irradiated fuel assemblies, and the only MODE where it is possible to move irradiated fuel assemblies within the reactor pressure vessel is MODE 5.	N/A	3.9.8
	3.9.7, RPV Water Level - New Fuel or Control Rods		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.7	3/4.9.8
A.2	Deletes "while in OPERATIONAL CONDITION 5" from the Applicability since the Specification deals only with handling new fuel assemblies or control rods, and the only MODE where it is possible to move new fuel assemblies or handle control rods within the reactor pressure vessel is MODE 5.	N/A	3.9.8
	3.9.8, Residual Heat Removal - High Water Level		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.8	3/4.9.11.1
A.2	Requires only that loading of irradiated fuel assemblies into the reactor pressure vessel be suspended versus CTS requirement that all operations involving an increase in the reactor decay heat load be suspended, since this is the only practical method of increasing the reactor decay heat load.	3.9.8 Required Action B.1	3.9.11.1 Action a
A.3	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 4 hours (initiating the actions as soon as possible).	3.9.8 Required Actions B.2, B.3, and B.4	3.9.11.1 Action a
A.4	Replaces the use of the defined term SECONDARY CONTAINMENT INTEGRITY with the essential elements of that definition.	3.9.8 Required Actions B.2, B.3, and B.4	3.9.11.1 Action a

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Deletes the footnote that states the normal or emergency power source may be inoperable for the RHR pump since it duplicative of the ITS definition of OPERABILITY.	1.1 OPERABLE-OPERABILITY definition	LCO 3.9.11.1 footnote #
	3.9.9, Residual Heat Removal - Low Water Level		
A.1	Editorial changes, reformatting, and revised numbering.	3.9.9	3/4.9.11.2
A.2	Deletes the footnote that states the normal or emergency power source may be inoperable for the RHR pump since it duplicative of the ITS definition of OPERABILITY.	1.1 OPERABLE-OPERABILITY definition	LCO 3.9.11.2 footnote #
	Current Specification 3/4.9.4, Decay Time		
NONE	NONE	NONE	NONE
	Current Specification 3/4.9.5, Communications		
NONE	NONE	NONE	NONE
	Current Specification 3/4.9.6, Crane and Hoist		
NONE	NONE	NONE	NONE
	Current Specification 3/4.9.7, Crane Travel		

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.1, Reactor Mode Switch Interlock Testing		
A.1	Editorial changes, reformatting, and revised renumbering.	3.10.1	Table 1.2 footnote #, 3.9.1 footnote ##
	3.10.2, Single Control Rod Withdrawal - Hot Shutdown		
A.1	Editorial changes, reformatting, and revised renumbering.	3.10.2	Table 1.2 footnote ***
	3.10.3, Single Control Rod Withdrawal - Cold Shutdown		
A.1	Editorial changes, reformatting, and revised renumbering.	3.10.3	3/4.9.10.1, Table 1.2 footnotes ## and ***
A.2	Deletes statements that require compliance with the Specification "until a control rod and associated control rod drive mechanism are reinstalled and the control rod is fully inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	LCO 3.9.10.1, 4.9.10.1
A.3	Since the MODE 4 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.9.10.1.b and 4.9.10.1.b references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	LCO 3.9.10.1.b, 4.9.10.1.b

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	CTS 3.9.10.1.c.1 and CTS 3.9.10.1.c.2 refer to an exception to the current normal SDM requirements, which requires additional margin for immoveable control rods. ITS 3.10.3 does not explicitly include the last half of existing c.1 or any of the existing c.2, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS definition and in the ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn.	N/A	LCO 3.9.10.1.c.1, LCO 3.9.10.1.c.2
A.5	Separates the CTS 3.9.10.1 ACTION into two ACTIONS, dependent on whether the affected control rod is insertable or not. ITS 3.10.3 ACTIONS are a more detailed presentation of the existing requirement to "initiate action to satisfy the above requirements."	3.10.3 ACTIONS	3.9.10.1 Action
A.6	Four new Notes have been added for clarity in ITS 3.10.3. The ITS 3.10.3 ACTIONS Note has been added to clarify that the requirement to enter the applicable condition of the affected Specification applies for each of the affected Specifications. ITS 3.10.3 Required Action A.1 Note 1 has been added to clarify that if an affected Specifications ACTIONS state to fully insert all insertable control rods, this includes placing the reactor mode switch in the Shutdown position. ITS 3.10.3 Required Action A.1 Note 2 has been added to clarify that this Required Action is only applicable if the requirement not met is an LCO, since it is written only for an LCO, not a "requirement." ITS SR 3.10.3.2 Note has been added clarifying that if proposed SR 3.10.3.1 is satisfied for ITS 3.10.3.c.1 requirements, then ITS SR 3.10.3.2 is not required to be performed.	3.10.3 ACTIONS Note, 3.10.3 Required Action A.1 Notes 1 and 2, SR 3.10.3.2 Note	N/A
	3.10.4, Single Control Rod Drive Removal - Refueling		
A.1	Editorial changes, reformatting, and revised renumbering.	3.10.4	3/4.9.10.1
A.2	Deletes statements that require compliance with the Specification "until a control rod and associated control rod drive mechanism are reinstalled and the control rod is fully inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	LCO 3.9.10.1, 4.9.10.1
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.9.10.1.b and 4.9.10.1.b references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	LCO 3.9.10.1.b, 4.9.10.1.b

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.4	CTS 3.9.10.1.c.1 and CTS 3.9.10.1.c.2 refer to an exception to the current normal SDM requirements, which requires additional margin for immoveable control rods. ITS 3.10.4 does not explicitly include the last half of existing c.1 or any of the existing c.2, but only identifies that the withdrawn rod is considered to be the "highest worth control rod," which in the CTS definition and in the ITS definition of SHUTDOWN MARGIN is assumed to be fully withdrawn.	N/A	LCO 3.9.10.1.c.1, LCO 3.9.10.1.c.2
A.5	Added a MODE 5 Applicability requirement in ITS 3.10.4 ("with LCO 3.9.5 not met") that is derived from the intent of CTS 3.9.10.1, which says "the associated control rod drive mechanism may be removed from ... the reactor pressure vessel..." When the control rod drive mechanism is removed, ITS 3.9.5, which requires all withdrawn control rods to be OPERABLE, is not met.	LCO 3.10.4	LCO 3.9.10.1
A.6	Adds an alternative Required Action (which results in effectively exiting this Special Operations LCO and restores operation consistent with normal requirements for failure to meet the LCOs which were suspended by the Special Operations LCO) to initiate action to fully insert all control rods immediately, in lieu of meeting the requirements of the LCO.	3.10.4 Required Action A.2.1	N/A
	3.10.5, Multiple Control Rod Withdrawal - Refueling		
A.1	Editorial changes, reformatting, and revised renumbering.	3.10.5	3/4.9.10.2
A.2	Deletes statements that require compliance with the Specification "until all control rods and control rod drive mechanisms are reinstalled and all control rods are inserted in the core," since such statements are fundamentally true for all Specifications and do not need to be stated in each individual Specification.	N/A	LCO 3.9.10.2, 4.9.10.2.1
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.9.10.2.b and 4.9.10.2.1.b references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	LCO 3.9.10.2.b, 4.9.10.2.1.b
A.4	Deletes redundant references, since the current MODE 5 requirements for SHUTDOWN MARGIN (SDM) in CTS 3.1.1 and Surveillance testing in CTS 4.1.1 are adequate without explicit reference to them.	N/A	LCO 3.9.10.2.c, 4.9.10.2.1.c

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.5	Adds a MODE 5 Applicability requirement in ITS 3.10.5 ("with LCO 3.9.4 or LCO 3.9.5 not met") is derived from the intent of CTS 3.9.10.2, which says "Any number of control rods and/or control rod drive mechanisms may be removed from the core and/or reactor pressure vessel..." During the performance of these activities, ITS 3.9.4 (which requires each control rod full-in position indication channel for each control rod to be OPERABLE), and ITS 3.9.5 (which requires all withdrawn control rods to be OPERABLE) are not met.	LCO 3.10.5	LCO 3.9.10.2
A.6	Adds an alternative Required Action (which results in effectively exiting this Special Operations LCO and restores operation consistent with normal requirements for failure to meet the LCOs which were suspended by the Special Operations LCO) to initiate action to fully insert all control rods immediately, in lieu of meeting the requirements of the LCO.	3.10.5 Required Action A.3.1	N/A
3.10.6, Control Rod Testing - Operating			
A.1	Editorial changes, reformatting, and revised renumbering.	3.10.6	3/4.10.2
A.2	Includes the statement "The requirements of LCO 3.1.6, "Rod Pattern Control," may be suspended..." for use if the special test sequence deviates from the specified sequence of ITS 3.1.6. The proposed requirements also allow, if the capability exists, the special test sequence to be programmed into the RWM, with the RWM still considered OPERABLE, i.e., no exception to RWM OPERABILITY is needed. In addition, a new SR has been added to verify, prior to control rod movement, that the proper control rod sequence for the test has been input into the RWM.	LCO 3.10.6, LCO 3.10.6.a, SR 3.10.6.2	LCO 3.10.2
A.3	Deletes the verification of control rod movement by an individual "who is present at the reactor control console," since this is the only location one could actually see the first individual move the control rod.	N/A	LCO 3.10.2
A.4	Revises Applicability to clarify actual applicable conditions for the proposed LCO; ITS Applicability now includes "with LCO 3.1.6 not met" since this is the intent of when the LCO is to be used.	LCO 3.10.6	LCO 3.10.2
A.5	The CTS 3.10.2 Action, which requires the RWM to be Operable if the requirements of CTS 3.10.2 are not met, has been changed to require suspending the test and exception to the analyzed rod position sequence requirements.	3.10.6 ACTION A	3.10.2 Action

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.6	Adds a new Note ITS SR 3.10.6.1 Note), which that if ITS SR 3.10.6.2 is satisfied, then ITS SR 3.10.6.1 is not required to be met.	SR 3.10.6.1 Note	N/A

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.7, SDM Test - Refueling		
A.1	Editorial changes, reformatting, and revised renumbering.	3.10.7	3/4.10.3, 3.1.3.5 Actions b.1 and b.2
A.2	Deletes the exceptions in CTS 3.10.3 to CTS 3.9.1 and CTS 3.9.3. The exception to CTS 3.9.1 is not needed since in the ITS the corresponding Specification no longer requires the reactor mode switch to be locked in Refuel at all times while in MODE 5. The exception to CTS 3.9.3 cannot be used, since CTS 3.10.3 precludes all other CORE ALTERATIONS from taking place.	N/A	LCO 3.10.3
A.3	Since the MODE 5 requirements for SRM OPERABILITY and Surveillance testing are adequate without explicit reference to them, the CTS 3.10.3.a and 4.10.3.a references are redundant to the current and proposed requirement, and therefore, have been deleted.	N/A	LCO 3.10.3.a, 4.10.3.a
A.4	Delineates as specific requirements for SDM on MODE 5 the current requirements for APRM RPS requirements in MODE 5 and control rod coupling in MODE 5, since they are deleted as normal MODE 5 requirements. This change includes an appropriate ACTION and Surveillance Requirements.	9 LCO 3.10.7a, LCO 3.10.7.c, 3.10.7 ACTION A, SR 3.10.7.1, SR 3.10.7.5	3.1.3.6, 3.3.1
A.5	Revises Applicability to clarify actual applicable conditions. The MODE 5 Applicability addition (with reactor mode switch in startup/hot standby position) is derived from the intent of CTS 3.10.3, which says "The provisions of...Table 1.2 may be suspended to permit the reactor mode switch to be in the Startup position..."	LCO 3.10.7	LCO 3.10.3
A.6	Adds Notes for clarity; 1) ITS SR 3.10.7.2 Note has been added clarifying that if ITS SR 3.10.7.3 is satisfied for ITS LCO 3.10.7.b.1 requirements, then ITS SR 3.10.7.2 is not required to be met; and 2) ITS SR 3.10.7.3 Note has been added clarifying that if ITS SR 3.10.7.2 is satisfied for ITS LCO 3.10.7.b.2 requirements, then ITS SR 3.10.7.3 is not required to be met.	SR 3.10.7.2 Note, SR 3.10.7.3 Note	N/A
A.7	Deletes CTS 3.1.3.5 Action b.2, which provides actions if multiple control rod scram accumulators are inoperable in MODE 5, since the multiple, inoperable withdrawn control rod accumulator requirement is already covered by ITS 3.9.5.	N/A	3.1.3.5 Action b.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	Current Specification 3/4.10.1, Primary Containment Integrity		
NONE	NONE	NONE	NONE
	Current Specification 3/4.10.5, Oxygen Concentration		
NONE	NONE	NONE	NONE
	Current Specification 3/4.10.6, Training Startups		
NONE	NONE	NONE	NONE
	Current Specification 3/4.10.8, Suppression Chamber Water Temperature (Unit 1 only)		
A.1	This exception is no longer needed at LaSalle 1 since all low power PHYSICS TESTS and the Startup Test Program have been completed.	N/A	3/4.10.8

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION
A.1	Editorial changes, reformatting, and revised numbering.	4.0	5.0
A.2	Deletes the Low Population Zone figure since a description of the area has been provided.	4.1.2	Figure 5.1.2-1
A.3	Moves the requirement to maintain limits on component cyclic and transient stresses.	5.5.5	5.7
A.4	(Unit 2 only) Deletes the requirement that k_{eff} for new fuel for the first core loading stored dry in the spent fuel storage racks not exceed 0.95 when flooded with water, since LaSalle Unit 2 has completed the first core loading.	N/A	5.6.1.2

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.1, Responsibility		
A.1	Editorial changes, reformatting, and revised numbering. Unit Supervisor	5.1	6.1.A.2, 6.1.B, Figure 6.1-3
A.2	Adds the defueled condition to the MODES or other specified conditions in which ~~an~~ individual with an SRO ~~or~~ RO license is designated to assume the control room command function, consistent with current plant practice.	5.1.2	Figure 6.1-3 footnote (c)
	5.2, Organization		
A.1	Editorial changes, reformatting, and revised numbering.	5.2	6.1.A, 6.1.C, Figure 6.1-3
A.2	Replaces the term "health physics" with the equivalent term "radiation protection."	5.2.1.d	6.1.A.4
A.3	Deletes the footnote that specifically disallows any shift crew position to be unmanned upon shift change because an oncoming shift crewman scheduled to come on duty is late or absent, since the requirement in this footnote is covered by the wording in ITS 5.2.2.~~e~~. b	5.2.2.b	Figure 6.1-3 footnote (a)
	5.3, Unit Staff Qualifications		
A.1	Editorial changes, reformatting, and revised numbering.	5.3	6.1.D
	5.4, Procedures		
A.1	Editorial changes, reformatting, and revised numbering.	5.4	6.2.A, 6.2,C, 6.2.D, 6.2.E

A.2	Deletes specific requirements for written procedures to implement the Station Security Plan and the Generating Station Emergency Response Plan since they are also required by 10 CFR 50.54(p) and 10 CFR 50, Appendix E.	N/A	6.2.A.c, 6.2.A.d
A.3	Deletes specific requirement for written procedures for ODCM implementation since it is covered by a more generic item, ITS 5.4.1.d, which requires this activity for all Programs and Manuals.	5.4.1.d	6.2.A.f
A.4	Deletes specific requirement that drills of the emergency procedures be conducted at frequencies as specified in the Generating Station Emergency Response Plan, and that certain communications link are tested in the course of a year, since they are already required by 10 CFR 50, Appendix E.	N/A	6.2.E
	5.5, Programs and Manuals		
A.1	Editorial changes, reformatting, and revised numbering.	5.5	1.27, 4.0.5, 4.8.1.1.2.c, 3/4.11.1.1, 3/4.11.2.1, 5.7, 6.2.F, 6.8
A.2	A statement of applicability of SR 3.0.2 has been added to CTS 6.2.F.1 (ITS 5.5.2), a statement of applicability of SR 3.0.3 has been added to CTS 4.0.5 (ITS 5.5.7.c), and a statement of applicability of SR 3.0.2 and SR 3.0.3 has been added to CTS 6.2.F.4 (ITS 5.5.4) and CTS 4.8.1.1.2.c (ITS 5.5.10).	5.5.2, 5.5.4, 5.5.7.c, 5.5.10	6.2.F.1, 4.0.5, 6.2.F.4, 4.8.1.1.2.c
A.3	Deletes the statement that exempts the requirements of CTS 4.0.2 from applying to the frequencies specified in the Primary Containment Leakage Rate Testing Program; the statement is redundant since in the ITS, the ITS Section 3.0 requirements only applies to ITS Sections 3.1 through 3.10.	N/A	6.2.F.7

A.4	The CTS states that the test frequencies for the Ventilation Filter Testing Program shall be in accordance with Regulatory Guide 1.52, Rev. 2, dated March 1978. The Regulatory Guide requires certain tests to be performed every 18 months. However, this Frequency is being changed to 24 months, as described in Discussion of Changes LD.2 and LD.3. Therefore, the actual test frequencies are being added into ITS 5.5.8.	5.5.8	6.2.F.8
A.5	Identifies additional definitions of frequencies "Biennially or every two years" and "Every 48 months" for the Inservice Testing Program.	5.5.7.a	N/A
A.6	Deletes redundant restatement that all applicable requirements must be met.	N/A	4.0.5.d
A.7	Places the diesel fuel oil testing requirements in a program, with a general program statement added as ITS 5.5.10. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.10	4.8.1.1.2.c
A.8	Places the liquid holdup tank requirements and the explosive gas mixture requirements in a program, with a general program statement added as ITS 5.5.9. A statement of applicability of SR 3.0.2 and SR 3.0.3 is added to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in the Administrative Controls Chapter.	5.5.9	3/4.11.1.1, 3/4.11.2.1
A.9	Deletes requirement for the Offsite Dose Calculation Manual (ODCM) to be approved by the Commission prior to implementation, since it has already been approved by the NRC.	N/A	6.8.1
A.10	Deletes reference to a CTS requirement that has been deleted in the ITS.	N/A	6.8.2.a
A.11	Revises reference from 10 CFR 20.106 to 10 CFR 20.1302, consistent with the recent revision to 10 CFR 20.	5.5.1.c.1.(b)	6.8.2.a.2)
A.12	Editorially changes the CTS designation of "CREF System" to "emergency makeup filter units (EMUs)." Furthermore, EMUs, Control Room Recirculation Filters (CRRFs), and Auxiliary Electric Equipment Room Recirculation Filters (AEERRFs) are considered subsystems of the Control Room Area Filtration (CRAF) System.	5.5.8	6.2.F.8
A.13	Added statement that the testing of filter trains following painting, fire, or chemical release is only required if the painting, fire, or chemical release is significant.	5.5.8	6.2.F.8

	5.6, Reporting Requirements		
A.1	Editorial changes, reformatting, and revised numbering.	5.6	Table 3.3.7.5-1, 6.6
A.2	Requires submittal of reports in accordance with 10 CFR 50.4, versus the CTS requirement that reports be submitted to the Regional Office.	5.6	6.6
A.3	Deletes subtitles of reports since each individual report is named rather than grouped under subtitles.	5.6	6.6
A.4	Allows a single report submittal to satisfy the Occupational Exposure Radiation reporting requirement for both units. In addition, clarifies that the Annual Radiological Environmental Operating Report submittal should combine only those sections common to both units.	5.6.1, 5.6.2	6.6.A.2, 6.6.A.3 footnote *
A.5	Adds another name (electronic dosimeter) for a new type of pocket dosimeter currently in use at LaSalle 1 and 2 to estimate the whole body doses required to be reported. In addition, the reference to 10 CFR 20 has been modified to reflect the proper reference to 10 CFR 20, based on the recent revision to 10 CFR 20.	5.6.1	6.6.A.2
A.6	Deletes the requirement to report the results of specific activity analysis in which the primary coolant exceeded CTS 3.4.5 limits, since it is included in the LER requirements to report fuel cladding failures that exceed expected values or that are caused by unexpected factors, i.e., being seriously degraded.	N/A	6.6.A.2
A.7	Requires the Annual Radioactive Effluent Release Report submittal to be "in accordance with 10 CFR 50.36a," in lieu of the current requirement to submit the report "prior to May 1 of each year," since compliance with 10 CFR 50 requirements is required by the LaSalle 1 and 2 Operating Licenses.	5.6.3	6.6.A.4
A.8	Deletes duplicate requirement; i.e., the general statement to submit special reports within the time period specified for each report.	N/A	6.6.C

A.9	Deletes the reference to requirements for units with separate radwaste systems, with respect to the Annual Radioactive Effluent Release Report, since at LaSalle 1 and 2, the radwaste systems are common to both units.	N/A	6.6.A.4 footnote **
	5.7, High Radiation Area		
A.1	Editorial changes, reformatting, and revised numbering.	5.7	6.1.1
A.2	The reference to 10 CFR 20 has been modified to reflect the proper reference to 10 CFR 20, based on the recent revision to 10 CFR 20.	5.7.1, 5.7.4	6.1.1.1, 6.1.1.4 (including footnote *)
	Current Specification 6.1.E/F, Training		
NONE	NONE	NONE	NONE
	Current Specification 6.2.B, Radiation Protection Program		
NONE	NONE	NONE	NONE
	Current Specification 6.3, Reportable Event Action		
A.1	Removes Reportable Event notification requirements for the Technical Specifications, since these requirements are contained in 10 CFR 50.72 and 10 CFR 50.73.	N/A	6.3.a
	Current Specification 6.4, Safety Limit Violation		

TABLE A - ADMINISTRATIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

A.1	Removes the Safety Limit Violation requirements, as they relate to NRC notification and permission to restart the unit are contained in and based upon the requirements located in 10 CFR 50.36(c)(1), 10 CFR 50.72, and 10 CFR 50.73.	N/A	6.4
Current Specification 6.5, Plant Operating Records			
NONE	NONE	NONE	NONE
Current Specification 6.7, Process Control Program			
NONE	NONE	NONE	NONE
Current Specification 6.9, Major Changes to Radioactive Waste Treatment Systems			
NONE	NONE	NONE	NONE

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Modifies CTS Table 1.2 by a) the addition of the head closure status (proposed footnote (a)) to Conditions (MODES) 3 and 4, b) the addition of the refuel mode switch position to MODE 2 (including footnote (a)), and c) the deletion of the coolant temperature limit of MODE 5. These changes address plant conditions not previously satisfying a defined MODE, or satisfying more than one MODE.	Table 1.1-1	Table 1.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 2.0 - SAFETY LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Extends the APPLICABILITY of each of the Safety Limits to all MODES of operation.	2.1.1.1, 2.1.1.2, 2.1.2, 2.1.1.3	2.1.1, 2.1.2, 2.1.3, 2.1.4
M.2	Specifies limits on steam dome pressure and core flow as "greater than or equal to" instead of "greater than," resolving a discontinuity between the Safety Limits in CTS 2.1.1 and CTS 2.1.2.	2.1.1.2, 2.2	2.1.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.0 - LCO AND SR APPLICABILITY

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	The statement, "For Frequencies specified as "once," the above interval extension does not apply," was added to clarify that the 1.25 times the interval specified in the Frequency does not apply to certain Surveillances.	SR 3.0.2	4.0.2

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.1.1, SHUTDOWN MARGIN		
M.1	Adds an additional Surveillance Frequency for SDM verification (CTS 4.1.1.a) to clarify the requirements necessary for assuring SDM during the refueling process.	SR 3.1.1.1 1st Frequency	N/A
	3.1.2, Reactivity Anomalies		
M.1	The CTS requires the reactivity difference between the actual critical control rod configuration and the predicted critical control rod configuration to be within limits. The CTS Bases clarifies that this verification can be performed by one of two methods: by comparison of the critical rod pattern selected base states to the predicted rod inventory at that state (i.e., rod density comparison) or by comparison of the monitored k_{eff} with the predicted k_{eff} as calculated by an approved 3-D core simulator code. These two methods to meet the CTS were previously approved by the NRC in the SER for Amendment Nos. 116 and 101, dated October 29, 1996. Since LaSalle 1 and 2 predicts the core reactivity using a 3-D simulator code and compares predicted k_{eff} with monitored k_{eff}, the alternate approach (i.e., the control rod density comparison) is not necessary and has been deleted.	LCO 3.1.2, SR 3.1.2.1	3.1.2, 4.1.2
	3.1.3, Control Rod OPERABILITY		
M.1	Revises the separation criteria for inoperable control rods to ensure the safety analysis assumptions are met. CTS requires the separation criteria to be met only for withdrawn control rods. ITS 3.1.3 Condition D applies to all inoperable control rods (when ≤10% RTP) whether inserted or withdrawn.	3.1.3 Condition D	3.1.3.1 Actions a.1.a) and b.1.a)1)
M.2	If more than one control rod is stuck, the ITS contains an additional requirement to disarm the stuck control rod, providing a necessary level of protection to the control rod drive should a scram signal occur. In addition, the allowance to disarm a stuck control rod electrically is deleted to prevent potential damage if a scram signal occurs.	3.1.3 Required Action A.2	3.1.3.1 Action a.1.b)

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.3	Eliminates the check of insertion capability for non-stuck inoperable control rods (i.e., when they are inoperable due to an inoperable CRD accumulator or due to loss of position indication when below the low power setpoint), replacing it with a requirement to fully insert and disarm all inoperable control rods.	3.1.3 ACTION C	3.1.3.1 Action b.1.a)2) including footnote **
M.4	Not used.	N/A	N/A
M.5	Requires control rods to be inserted in lieu of the CTS requirement for "moving," since the purpose of the test is to assure scram insertion capability and restricting the test to only allow control rod insertion provides an increased likelihood of this test detecting a problem that impacts this capability.	SR 3.1.3.2, SR 3.1.3.3	4.1.3.1.2
M.6	Changes Actions for non-stuck inoperable control rods (i.e., when control rod position indication is lost) to eliminate the check of insertion capability; replacing it with a requirement to fully insert and disarm all inoperable control rods.	3.1.3 ACTION C	3.1.3.7 Action a.3.(a)1)
3.1.4, Control Rod Scram Times			
M.1	Changes the pressure at which the control rods must be tested from ≥ 950 to ≥ 800 psig, corresponding to the limiting pressure for CRD scram testing for the LaSalle 1 and 2 CRD System.	SR 3.1.4.1, SR 3.1.4.2, SR 3.1.4.4	4.1.3.2
M.2	Deletes the flexibility provided by CTS 4.1.3.2.b "for specifically affected" control rods to delay post-maintenance testing until reactor pressure is ≥ 950 psig (i.e., entry into MODE 2 is currently allowed without scram time testing a control rod that has had maintenance performed). A Surveillance Requirement, SR 3.1.4.3, has been added that requires a scram time test, which may be done at any reactor pressure, prior to declaring the control rod operable. To allow testing at less than normal operating pressures, a requirement for scram time limits at < 800 psig is included. The normal pressure test also has a finite complete time: "prior to exceeding 40% RTP."	SR 3.1.4.3, SR 3.1.4.4	4.1.3.2.b

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.3	Revises the requirements of the control rod scram time to ensure the negative scram reactivity corresponding to that used in licensing basis calculations is supported by individual control rod drive scram performance distributions allowed by the Technical Specifications. Provides new individual control rod scram time limits, limits the number of slow control rods to 12, ensures no more than 2 slow rods occupy adjacent locations, and ensures that a control rod is not inadvertently considered "slow" when the scram time exceeds 7 seconds.	LCO 3.1.4, Table 3.1.4-1	LCO 3.1.3.2, LCO 3.1.3.3, LCO 3.1.3.4
	3.1.5, Control Rod Scram Accumulators		
900 M.1	Restricts the current 8 hour allowance to restore an inoperable accumulator to apply only when the reactor pressure is greater than or equal to 950 psig, since control rods may not insert on a scram signal at reduced reactor pressures with the associated accumulator inoperable.	3.1.5 ACTION A	3.1.3.5 Action a.1.a)
	3.1.6, Rod Pattern Control		
M.1	Adds a new Specification requiring the control rod pattern to be in compliance with the analyzed rod position sequence when THERMAL POWER is ≤ 10% RTP in MODES 1 and 2. This ensures the analysis assumptions relative to the Control Rod Drop Accident are maintained.	3.1.6	N/A
	3.1.7, Standby Liquid Control System		
M.1	To ensure consistency with the temperature/concentration requirements of CTS Figure 3.1.5-1 at the maximum allowable sodium pentaborate solution concentration, the pump suction piping temperature limit is increased from ≥ 60°F to ≥ 68°F.	SR 3.1.7.3	4.1.5.a.2
	3.1.8, SDV Vent and Drain Valves		
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
Current Specification 3/4.1.3.8, Control Rod Drive Housing Support			
NONE	NONE	NONE	NONE
Current Specification 3/4.1.6, Economic Generation Control System			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.2 - POWER DISTRIBUTION LIMITS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
3.2.1, AVERAGE PLANAR LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE
3.2.2, MINIMUM CRITICAL POWER RATIO			
NONE	NONE	NONE	NONE
3.2.3, LINEAR HEAT GENERATION RATE			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.3.1.1, RPS Instrumentation		
M.1	Deletes the exemption to the provisions of CTS 4.0.4, provided for the CHANNEL CHECK of Functional Units 1.a and 2.a, that allows entry into MODE 2 from MODE 1 for 24 hours, since the Surveillance can be performed in MODE 1 at low power prior to entering MODE 2.	N/A	Table 4.3.1.1-1 footnote * for Functional units 1.a and 2.a
M.2	The CTS Table 3.3.1-1 requires only one OPERABLE channel per trip system of the RPS Manual Scram Function (Functional Unit 12). However, UFSAR Table 7.2-2 and Table 7.2-3 identify a minimum of 2 channels of the Manual Scram Function per trip system required for the functional performance of the RPS. Therefore, the number of required channels per trip system is increased to 2.	Table 3.3.1.1-1 Function 11	Table 3.3.1-1 Functional Unit 12
M.3	(Unit 1 only) Adds a CHANNEL CHECK requirement for the Reactor Vessel Water Level - Low, Level 3 Function.	SR 3.3.1.1.1 for Table 3.3.1.1 Function 4	N/A
A.8	Enhances presentation by requiring actions to be immediately initiated to insert control rods (completing the actions as soon as possible) in lieu of current requirement to insert the control rods in 1 hour (initiating the actions as soon as possible).	3.3.1.1 Required Action H.1	Table 3.3.1-1 Actions 3 and 9
	3.3.1.2, SRM Instrumentation		
M.1	Adds a restriction to determine signal-to-noise ratio and verify it is greater than or equal to 2:1 or 20:1, depending upon the count rate requirement.	SR 3.3.1.2.6, SR 3.3.1.2.5	4.3.7.6.b, 4.9.2.b
M.2	Places a time limit of 24 hours on how soon prior to the withdrawal of control rods the verification of SRM count rate to be within limits must be performed. In addition, the Surveillance must also be performed once per 24 hours in MODE 2 with IRMs on Range 2 or below and in MODES 3 and 4, regardless of whether or not control rods are withdrawn. Since surveillances must be performed at all times, not just prior to control rod withdrawal, the phrase "before withdrawal of control rods" is not needed and has been deleted.	SR 3.3.1.2.4	4.3.7.6.c

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M.3	Adds a Surveillance Requirement requiring the SRMs to be calibrated every 24 months if in MODE 5 to verify the performance of the SRM detectors and associated circuitry.	SR 3.3.1.2.7	N/A
M.4	The CTS Applicability does not require SRMs to be OPERABLE when no more than four fuel assemblies are present in each core quadrant with an SRM when those fuel assemblies are positioned adjacent to that quadrant's SRM. The CTS does however, provide specific criteria to be met if movable detectors are being used. The ITS requires at least two SRM channels to be OPERABLE at all times when in MODE 5 (unless performing a spiral offload or reload), but provides specific allowances in SR 3.3.1.2.4 to verify OPERABILITY for conditions when the removal of fuel assemblies would not maintain the required count rate and verification for required positions of SRM detectors in SR 3.3.1.2.2.	3.3.1.2, SR 3.3.1.2.2, SR 3.3.1.2.4	3.9.2 Applicability
M.5	CTS 4.9.2.a.3 requires verifying that the detector of an OPERABLE SRM channel is located in the core quadrant where CORE ALTERATIONS are being performed and one is located in the adjacent quadrant. ITS SR 3.3.1.2.2 requires verifying that an OPERABLE SRM detector is located in the fueled region; the core quadrant where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region; and in a core quadrant adjacent to where CORE ALTERATIONS are being performed, when the associated SRM is included in the fueled region. As a result of providing the additional criteria on where the OPERABLE SRMs must be relocated (one in the fueled region), Note 2 to ITS SR 3.3.1.2.2 is also added to clarify that more than one of the three requirements of ITS SR 3.3.1.2.2 can be satisfied by the same SRM since only two SRMs are required to be OPERABLE.	SR 3.3.1.2.2, including Note 2	4.9.2.a.3
	3.3.2.1, Control Rod Block Instrumentation		
M.1	Deletes the allowance to place a channel in an inoperable status, without requiring actions to be taken, for up to 12 hours to repair the channel provided at least one other OPERABLE channel in the same trip system is monitoring that parameter.	N/A	4.3.6 footnote *
M.2	Adds an RBM Surveillance to verify the automatic enabling points of the RBM.	SR 3.3.2.1.5	N/A
M.3	The Note to ITS SR 3.3.2.1.2 will require the RWM to be determined Operable (by performing a CHANNEL FUNCTIONAL TEST) within 1 hour after withdrawal of any control rod when RTP is ≤ 10%, not just when the withdrawal is for the purpose of making the reactor critical.	SR 3.3.2.1.2 Note	3.1.4.1 footnote *, 4.1.4.1.a and b
M.4	Adds an RWM Surveillance to verify the automatic enabling point of the RWM.	SR 3.3.1.2.6	N/A

M.5	Adds requirements regarding the Reactor Mode Switch—Shutdown Position channels and an associated ACTION and Surveillance Requirement.	Table 3.3.2.1-1 Function 3, 3.3.2.1 ACTION E, SR 3.3.2.1.7	N/A
3.3.2.2, Feedwater System and Main Turbine High Water Level Trip Instrumentation			
NONE	NONE	NONE	NONE
3.3.3.1, Post Accident Monitoring Instrumentation			
M.1	Adds requirements for the Penetration Flow Path Primary Containment Isolation Valve (PCIV) Position Function, since this Function is a Category 1 instrument for LaSalle 1 and 2.	Table 3.3.3.1-1 Function 6, 3.3.3.1 ACTIONS A, B, C, D, and E, SR 3.3.3.1.1, SR 3.3.3.1.3	N/A
M.2	Increases the required number of channels for the Suppression Chamber Water Temperature Function from 7 (1 per well) to "2," where the Bases states there are 2 channels of suppression chamber water temperature measurement, each receiving input from 7 temperature sensors, for a total of 14 required temperature sensors.	Table 3.3.3.1-1 Function 9	Table 3.3.7.5-1 Instrument 4

M.3	The Reactor Vessel Water Level instrumentation in CTS Table 3.3.7.5-1 consists of instruments with different ranges to satisfy Regulatory Guide 1.97 requirements. The different ranges are: "wide range" covering -150 inches to +60 inches; and "fuel zone" covering -311 inches to +111 inches. Currently, CTS Table 3.3.7.5-1 only specifies requirements for two channels but does not specify the required ranges. Using the ITS format, the instruments required to cover these ranges are delineated in ITS Table 3.3.3.1-1 as separate line items under Function 2, with each channel consisting of only one instrument. Therefore, ITS Table 3.3.3.1-1 Function 2.a (Reactor Vessel Water Level - Fuel Zone) and Function 2.b (Reactor Vessel Water Level - Wide Range) will each specify requirements for two channels (for a total of 4 channels).	Table 3.3.3.1-1 Functions 2.a and 2.b	Table 3.3.7.5-1 Instrument 2
M.4	The Drywell Pressure instrumentation in CTS Table 3.3.7.5-1 specifies requirements for two channels but does not specify the required range. To actually achieve the Regulatory Guide 1.97 required range, two instruments are necessary in each channel - one "narrow range" covering -5 psig to +5 psig; and one "wide range" covering 0 psig to +200 psig. Using the ITS format, the instruments required to cover these ranges are specifically delineated in ITS Table 3.3.3.1-1 as separate line items under Function 4, with each channel consisting of one instrument. Therefore, ITS Table 3.3.3.1-1 Function 4.a (Drywell Pressure - Narrow Range) and Function 4.b (Drywell Pressure - Wide Range) will each specify requirements for two channels (for a total of 4 channels).	Table 3.3.3.1-1 Functions 4.a and 4.b	Table 3.3.7.5-1 Instrument 6
M.5	Increases the CHANNEL CALIBRATION frequency for the Drywell Oxygen Concentration Analyzer and Monitor from 18 months to 92 days to place it on the same testing schedule as the Drywell Hydrogen Concentration Analyzer and Monitor for operational convenience, as is the current practice.	SR 3.3.3.1.2	4.3.7.5 for Table 4.3.7.5-1 Function 8
3.3.3.2, Remote Shutdown Monitoring System			
NONE	NONE	NONE	NONE
3.3.4.1, EOC-RPT Instrumentation			

M.1	Adds a Note to ITS 3.3.4.1 Required Action A.2 to prevent this Required Action from being used if the channels are inoperable due to a trip breaker that will not open, because placing the channels in the tripped condition will not accomplish the intended restoration of the functional capability. With the addition of the Note, ITS 3.3.4.1 Required Action A.1 has also been added to restore the channel in lieu of tripping the channel. This new Note and Required Action will ensure the functional capability of the EOC-RPT System is restored (by restoring the inoperable channel) within the allowed Completion Time when a trip breaker is inoperable.	3.3.4.1 Required Action A.1, 3.3.4.1 Required Action A.2 Note	3.3.4.2 Actions b and c.1
M.2	The time allowed to reduce THERMAL POWER to less than 25% of RATED THERMAL POWER when one or both trip systems are not returned to OPERABLE status within the allowed Completion Times and the MCPR limit is not adjusted has been reduced from 6 hours to 4 hours.	3.3.4.1 Required Action C.2	3.3.4.2 Actions d.2 and e.2
	3.3.4.2, ATWS-RPT Instrumentation		
M.1	Adds a Note to ITS 3.3.4.2 Required Action A.2 to prevent this Required Action from being used if the channels are inoperable due to a trip breaker that will not open, because placing the channels in the tripped condition will not accomplish the intended restoration of the functional capability. This new Note will ensure the functional capability of the ATWS-RPT System is restored (by restoring the inoperable channel) within the allowed Completion Time when a trip breaker is inoperable.	3.3.4.2 Required Action A.2 Note	3.3.4.1 Actions b and c.1
	3.3.5.1, ECCS Instrumentation		
M.1	Adds an additional channel per trip system for the ADS Drywell Pressure Bypass Timer Function, since each Trip System includes two bypass timers, and both bypass timers must function for each trip system to complete the appropriate logic.	Table 3.3.5.1-1 Functions 4.g and 5.f	Table 3.3.3-1 Trip Functions A.2.h and B.2.g
M.2	Adds appropriate Required Actions for response to loss of the initiation capability of certain Functions for both divisions/trip systems.	3.3.5.1 Required Actions B.2, C.1, D.1, E.1, and F.1	Table 3.3.3-1 Action 35.a

M.3	Not used.	N/A	N/A
M.4	The following additional Allowable Values have been added: a) A maximum Allowable Value for the LPCS, LPCI, and HPCS Pump Discharge Flow — Low (Bypass), has been provided to ensure the valves will close to provide assumed ECCS flow to the core; and b) Maximum Allowable Values for the LPCS and RHR Pump Discharge Pressure—High have been provided to ensure the setpoint is below the shutoff head of the low pressure ECCS pumps.	Table 3.3.5.1-1 Function 1.e, 1.f, 2.e, 3.e, 4.e, 4.f, and 5.e	Table 3.3.3-2 Trip Functions A.1.c, A.1.g, A.2.e, A.2.f, B.1.e, B.2.e, and C.1.g
M.5	Not used.	N/A	N/A
M.6	Adds an additional channel per trip system for the ADS Manual Initiation Function, since each Trip System includes two push button channels, and both push button channels must function for each trip system to complete the appropriate logic.	Table 3.3.5.1-1 Functions 4.h and 5.g	Table 3.3.3-1 Trip Function A.2.g and B.2.f
	3.3.5.2, RCIC System Instrumentation		
M.1	An additional Function has been added, ITS Table 3.3.5.2-1 Function 3, to provide requirements for the Condensate Storage Tank Level—Low Instrumentation. Appropriate ACTIONS and Surveillances have also been added.	Table 3.3.5.2-1 Function 3, 3.3.5.1 ACTION D	N/A
M.2	An appropriate Required Action has been added for response to loss of RCIC initiation capability of a Function.	3.3.5.2 Required Action B.1	N/A
	3.3.6.1, Primary Containment Isolation Instrumentation		
M.1	CTS 3.3.2-1 Trip Function A.1.c.3), Main Steam Line Flow—High requires 2 channels per trip system for each main steam line. However, CTS Table 3.3.2-1 footnote (d) specifies that a channel is OPERABLE if 2 of 4 instruments in that channel are OPERABLE. This Note has been deleted since 2 channels per steam line are required to be OPERABLE in each trip system to ensure the single failure criteria is preserved.	N/A	Table 3.3.2-1 footnote (d)

M.2	The CTS provides no actions for inoperable channels that affect the Group 4 primary containment isolation valves. Therefore, appropriate actions have been added.	3.3.6.1 ACTIONS F and H	Table 3.3.2-1 ACTION 24 for Trip Functions A.2.a, A.2.b, A.2.c, and A.2.d
M.3	Allowable Values for two Functions have been added. These Functions are Timer Functions that delay initiation of the RCIC Steam Flow—High and RWCU Differential Flow—High Functions.	Table 3.3.6.1-1 Functions 3.b and 4.b	N/A
M.4	The Applicability for the Reactor Vessel Water Level—Low, Level 3 Function has been changed to require Operability in MODES 4 and 5, with only one of the two low water level instrumentation trip systems required to be Operable when RHR System integrity is maintained. An appropriate ACTION has also been added for when the channel(s) of the Function is inoperable in MODES 4 and 5.	Table 3.3.6.1-1 Function 5.a and Note (c), 3.3.6.1 ACTION J	Tables 3.3.2-1 and 4.3.2.1-1 Trip Function A.6.a Applicability
M.5	The number of required channels for the Group 1 MSIV Manual Initiation Function has been increased from "1" per trip system to "2" per trip system. The design of the Group 1 logic for MSIVs includes two manual push buttons per trip system, with one from each trip system being required to actuate the MSIVs. Currently, only one channel per trip system is required.	Table 3.3.6.1-1 Function 1.f	Table 3.3.2-1 Trip Function B.1 and B.2
M.6	The CHANNEL CALIBRATION Frequency for the Main Steam Line Flow—High Function has been changed from 18 months to 92 days.	Table 3.3.6.1-1 Function 1.c, SR 3.3.6.1.3	Table 4.3.2.1-1 Trip Function A.1.c.3)
M.7	Adds the Manual Initiation Function for primary containment isolation valve Group 10 into ITS Table 3.3.6.1-1 Function 2.g.	Table 3.3.6.1-1 Function 2.g	N/A
3.3.6.2, Secondary Containment Isolation Instrumentation			
M.1	For the Manual Initiation Function of secondary containment isolation actuation instrumentation, the CTS provides 32 hours or 48 hours of operation before isolation of the valves or a shutdown is required. The ITS will allow only 24 hours before isolation of the valves is required.	3.3.6.2 ACTION A	Table 3.3.2-1 Action 26

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

	3.3.7.1, CRAF System Instrumentation		
M.1	Deletes the allowance that provides 4 hours to adjust an Allowable Value to within its limit prior to declaring the channel inoperable.	N/A	3.3.7.1 Action a
M.2	CTS Table 3.3.7.1-1 footnote **, "provided at least one other operable channel in the same Trip System is monitoring that Trip Function," has been clarified to provide direct indication of the intent of the current wording. The ITS Note states "provided the associated Function maintains CRAF subsystem initiation capability."	Surveillance Requirements Note	Table 3.3.7.1-1 footnote **
	3.3.8.1, Loss of Power Instrumentation		
M.1	The CTS requires the LOP instruments to be OPERABLE during MODES 4 and 5 only when the associated ESF equipment is required to be OPERABLE. In the ITS, the Applicability is being changed to be when the associated DG is required to be OPERABLE by LCO 3.8.2, "AC Sources — Shutdown," which requires the LOP instrumentation to be OPERABLE not only during MODES 4 and 5, but also during movement of irradiated fuel assemblies in the secondary containment.	3.3.8.1 Applicability	Tables 3.3.3-1 and 4.3.3.1-1 footnote **
M.2	CTS Table 3.3.3-1 footnote (d), "provided at least one other OPERABLE channel/instrument in the same trip system is monitoring that parameter," has been clarified to provide direct indication of the intent of the current wording. The ITS Note states "provided the associated Function maintains LOP initiation capability."	Surveillance Requirements Note 2	Table 3.3.3-1 footnote (d)
	3.3.8.2, RPS Electric Power Monitoring		
M.1	Adds time delay setting requirements for the overvoltage, undervoltage, and underfrequency protective devices of the RPS logic electric power monitoring assemblies.	SR 3.3.8.2.2	N/A
	Current Specification 3/4.3.7.3, Meteorological Monitoring Instrumentation		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.3 - INSTRUMENTATION

NONE	NONE	NONE	NONE
Current Specification 3/4.3.7.11, Explosive Gas Monitoring Instrumentation			
NONE	NONE	NONE	NONE
Current Specification 3/4.3.7.12, Loose Part Detection System			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.4.1, Recirculation Loops Operating		
M.1	Not used.	N/A	N/A
M.2	Reduces the time allowed to satisfy the requirements of the LCO (i.e., enter Region III) from 4 hours to 2.	3.4.1 ACTION B	3.4.1.5 Action b.2
M.3	Replaces the requirement to perform a controlled shutdown per CTS 3.0.3 with a requirement to immediately place the reactor mode switch in the shutdown position, when operation in Region III is not restored within the allowed time.	3.4.1 ACTION E	3.0.3
M.4	Adds a Surveillance Requirement to verify operation is in Region III of ITS Figure 3.4.1-1 every 24 hours.	SR 3.4.1.2	N/A
	3.4.2, Flow Control Valves		
NONE	NONE	NONE	NONE
	3.4.3, Jet Pumps		
NONE	NONE	NONE	NONE
	3.4.4, Safety/Relief Valves		
NONE	NONE	NONE	NONE
	3.4.5, RCS Operational Leakage		

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TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

M.1	Adds a requirement that the source of leakage to be identified within 4 hours is not from intergranular stress corrosion cracking (IGSCC) susceptible material.	3.4.5 ACTION B	3.4.3.2 Action e
3.4.6, RCS Pressure Isolation Valve Leakage			
M.1	Adds a Note that requires the valves used to provide isolation between the high pressure and low pressure portions of the affected system to have been verified to meet the PIV leakage limits within the required Surveillance Frequency and that the valves be in the reactor coolant system or the high pressure portion of the affected system.	3.4.6 Required Actions A.1 and A.2 Note	N/A
3.4.7, RCS Leakage Detection System Instrumentation			
NONE	NONE	NONE	NONE
3.4.8, RCS Specific Activity			
M.1	Changes the Frequency for isotopic analysis for dose equivalent I-131 concentration from at least once per 31 days to at least once per 7 days as a compensatory measure for ensuring that even with deletion of the requirement that gross specific activity remain less than or equal to 100/E-bar μCi/gram, offsite doses will remain within a small fraction of the limits of 10 CFR 100.	SR 3.4.8.1	Table 4.4.5-1 Item 2
3.4.9, RHR Shutdown Cooling System - Hot Shutdown			
NONE	NONE	NONE	NONE
3.4.10, RHR Shutdown Cooling System - Cold Shutdown			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.4 - REACTOR COOLANT SYSTEM

3.4.11, RCS Pressure and Temperature Limits			
M.1	Completion Times are added in the ITS for the engineering evaluation requirement.	3.4.11 Required Actions A.2 and C.2	3.4.6.1 Action
M.2	Adds Actions which require an engineering evaluation to be performed to ensure continued operation is acceptable when a recirculation pump is started or running without having met the temperature requirements. CTS only states to suspend the startup of a recirculation loop; it does not provide an action if the loop is already operating.	3.4.11 ACTIONS A, B, and C	3.4.1.4 Action
3.4.12, Reactor Steam Dome Pressure			
M.1	Deletes footnote that states that the reactor steam dome pressure limit is not applicable during anticipated transients.	N/A	3.4.6.2 footnote *
Current Specification 3/4.4.8, Structural Integrity			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.5 - ECCS AND RCIC SYSTEM

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.5.1, ECCS-Operating		
M.1	Adds a requirement, as represented by the STAGGERED TEST BASIS, for both ADS valve solenoids to be verified in the course of 48 months.	SR 3.5.1.8	4.5.1.d.2.b)
M.2	Deletes the CTS 4.0.4 exception to delay performing the ADS valve opening Surveillance until 12 hours after adequate steam pressure is attained. The ADS valve opening Surveillance will now be required to be performed when the plant is shutdown and at low pressure.	N/A	3.5.1 Action h
	3.5.2, ECCS-Shutdown		
M.1	Deletes the allowance to not require the suppression pool to be OPERABLE during cavity flooding.	N/A	3.5.3 footnote *
A.3	Enhances presentation by requiring actions to be immediately initiated to restore secondary containment boundary (completing the actions as soon as possible) in lieu of current requirement to establish within 8 hours (initiating the actions as soon as possible).	3.5.2 ACTION D	3.5.2 Action b, 3.5.3 Action b
	3.5.3, RCIC System		
NONE	NONE	NONE	NONE

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TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.6.1.1, Primary Containment		
NONE	NONE	NONE	NONE
	3.6.1.2, Primary Containment Air Lock	NONE	
~~L.3~~ NONE	~~In reference to the CTS action to immediately maintain an air lock door closed, changes the word "maintain" to "verify" and 1 hour is allowed to complete the verification in the ITS. The CTS does not specify a time limit to verify closure.~~ NONE	~~3.6.1.2 Required Actions A.1 and C.2~~	~~3.6.1.3 Actions a.1 and b~~ NONE
	3.6.1.3, Primary Containment Isolation Valves		
M.1	Adds a new Applicability of "when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation"," which effectively adds a MODE 4 and 5 requirement to the RHR Shutdown Cooling System isolation valves. Appropriate ACTIONS have been added for when the valves cannot be isolated or restored within the current 4 hour limit.	3.6.1.3 Applicability, 3.6.1.3 ACTION F	N/A
M.2	Not used.	N/A	N/A
M.3	Adds a new Surveillance Requirement that verifies the 8 and 26 inch purge valves are closed every 31 days (except when allowed to be open, as described in DOC L.12 for ITS 3.6.1.3).	SR 3.6.1.3.1	N/A
~~L.3~~	~~In reference to the CTS action to immediately maintain an air lock door closed, changes the word "maintain" to "verify" and 1 hour is allowed to complete the verification in the ITS.~~	~~3.6.1.2 Required Actions A.1 and C.2~~	~~3.6.1.3 Actions a.1 and b~~
	3.6.1.4, Drywell and Suppression Chamber Pressure		

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NONE	NONE	NONE	NONE
3.6.1.5, Drywell Air Temperature			
NONE	NONE	NONE	NONE
3.6.1.6, Suppression Chamber-to-Drywell Vacuum Breakers			
M.1	CTS 3.6.4 Action a only allows one of the four vacuum breakers to be inoperable for opening, but CTS 3.6.4 Action b could allow a separate vacuum breaker to be inoperable due to being open. The current accident analysis does not allow two vacuum breakers to be inoperable. When more than one vacuum breaker is inoperable, CTS LCO 3.0.3 must be entered. Therefore, ITS 3.6.1.6 ACTION D has been added to ensure that when two or more vacuum breakers are inoperable, ITS LCO 3.0.3 will continue to be entered.	3.6.1.6 ACTION D	~~3.0.3~~ N/A
3.6.2.1, Suppression Pool Average Temperature			
M.1	CTS allows the suppression pool temperature to be increased to 120°F with the main steam isolation valves (MSIVs) closed following a scram. The ITS, which requires reactor vessel depressurization to < 200 psig when pool temperature exceeds 120°F, does not depend upon if the MSIVs are open or closed. In addition, the requirement in CTS 3.6.2.1.a.2.b), with closed MSIVs, has been removed from the LCO and is now only in the ACTIONS.	3.6.2.1 ACTION D	3.6.2.1.a.2.b)
M.2	The CTS Applicability for the 110°F limit is MODES 1, 2, and 3 with THERMAL POWER ≤ 1% RTP. The CTS Applicability for the 120°F limit is MODES 1, 2, and 3. However, the current Actions for when temperature exceeds 110°F require scramming the reactor, and for when temperature exceeds 120°F only requires a depressurization to < 200 psig, both of which are still MODE 3. In the ITS, when temperature exceeds 110°F or 120°F, the unit must also be placed in MODE 4 within 36 hours.	3.6.2.1 ACTIONS C and D	3.6.2.1.a.2.a), 3.6.2.1.a.2.b), 3.6.2.1 Actions b.1 and b.2
M.3	Expands, from MODES 1 and 2 to MODES 1, 2, and 3, the applicability for performance of the suppression pool average temperature verification.	SR 3.6.2.1.1	4.6.2.1.b

3.6.2.2, Suppression Pool Water Level			
NONE	NONE	NONE	NONE
3.6.2.3, RHR Suppression Pool Cooling			
~~A.2~~ NONE	~~Deletes CTS 3.6.2.3 Action b, footnote *, which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4. ITS 3.6.2.3 Action C requires a shutdown to MODE 4 with no allowance to remain in MODE 3.~~ NONE	~~3.6.2.3 Action C~~ NONE	~~3.6.2.3 Action b, footnote *~~ NONE
3.6.2.4, RHR Suppression Pool Spray			
~~A.2~~ NONE	~~Deletes CTS 3.6.2.2 Action b, footnote *, which allows the unit to maintain reactor coolant temperature as low as practical, in lieu of attaining MODE 4, when two or more RHR subsystems are inoperable and the unit is unable to attain MODE 4. ITS 3.6.2.4 Action C requires a shutdown to MODE 4 with no allowance to remain in MODE 3.~~ NONE	~~3.6.2.4 Action C~~ NONE	~~3.6.2.2 Action b, footnote *~~ NONE
3.6.3.1, Primary Containment Hydrogen Recombiners			
NONE	NONE	NONE	NONE
3.6.3.2, Primary Containment Oxygen Concentration			
NONE	NONE	NONE	NONE
3.6.4.1, Secondary Containment			

NRC See comment 4

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.6 - CONTAINMENT SYSTEMS

M.1	Deletes the allowance that provides a delay of 1 hour prior to declaring Secondary Containment inoperable when the Reactor Building Ventilation System fails (which could result in failure to meet CTS 4.6.5.1.a).	N/A	4.6.5.1.a footnote #
M.2	Requires both subsystems be tested in the course of 48 months, as represented by the Staggered Test Basis requirement of the 24 month Frequency. CTS requires that one subsystem be tested every 18 months; however, the same SGT subsystem could be tested at each testing occurrence.	SR 3.6.4.1.3, SR 3.6.4.1.4	4.6.5.1.c
3.6.4.2, Secondary Containment Isolation Valves			
M.1	CTS 4.6.5.1.b requires all secondary containment penetrations not capable of being closed by OPERABLE secondary containment automatic isolation dampers and required to be closed during accident conditions to be closed. This can be met by a single manual valve being closed. CTS 3.6.5.2 requires each secondary containment ventilation system automatic isolation damper to be OPERABLE. CTS 3/4.6.5.2 does not prescribe limitations on manual valves. ITS LCO 3.6.4.2 requires each SCIV to be OPERABLE and proposed SR 3.6.4.2.1 requires the verification that each secondary containment isolation manual valve and blind flange that is not locked sealed or otherwise secured and is required to be closed during an accident is closed. This provides assurance that the position of all secondary containment isolation valves and blind flanges are properly controlled to ensure design basis assumptions are met.	LCO 3.6.4.2, SR 3.6.4.2.1	4.6.5.1.b
3.6.4.3, Standby Gas Treatment System			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.7.1, Residual Heat Removal Service Water System		
NONE	NONE	NONE	NONE
	3.7.2, Diesel Generator Cooling Water System		
M.1	Changes the Applicability from "When the diesel generator is required to be OPERABLE" to "MODES 1, 2, and 3," since the DGCW also provides cooling water to the ECCS cubical area cooling coils. (The MODES 4 and 5 Applicability is discussed in DOC LA.2 for ITS 3.7.2.)	3.7.2	3.7.1.2
	3.7.3, Ultimate Heat Sink temperature of the		
M.1	Adds a new Surveillance Requirement to require verification that the cooling water supplied to the plant from the UHS (CSCS pond) is ≤ 97.5°F every 24 hours. Adds an ACTION that requires a shutdown of the unit is the average water temperature is not within the new limit.	SR 3.7.3.1, 3.7.3 ACTION B	N/A
	3.7.4, Control Room Area Filtration System		
NONE	NONE	NONE	NONE
	3.7.5, Control Room Area Ventilation Air Conditioning System		
M.1 Open	To ensure the OPERABILITY of components in the control room in a post-accident environment, a new Specification has been added requiring the Control Room Area Ventilation Air Conditioning System to be OPERABLE.	3.7.5	N/A
	3.7.6, Main Condenser Offgas		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.7 - PLANT SYSTEMS

M.1	Changes the amount of increase requiring verification that the release rate of the sum of noble gases measured prior to the holdup line is within limits following an increase from > 50% to include an increase equivalent to 50%.	SR 3.7.6.1	4.11.2.2.2.b
3.7.7, Main Turbine Bypass System			
NONE	NONE	NONE	NONE
3.7.8, Spent Fuel Storage Pool Water Level			
NONE	NONE	NONE	NONE
Current Specification 3/4.7.4, Sealed Source Contamination			
NONE	NONE	NONE	NONE
Current Specification 3/4.7.7, Area Temperature Monitoring			
NONE	NONE	NONE	NONE
Current Specification 3/4.7.8, Structural Integrity of Class 1 Structures			
NONE	NONE	NONE	NONE
Current Specification 3/4.7.9, Snubbers			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.8.1, AC Sources - Operating		
M.1	The CTS requires de-energization and re-energization of the Division 3 bus and its loads for loss-of-offsite-power simulation testing and for testing of response to a loss-of-offsite-power in conjunction with an ECCS actuation. The ITS is written to differentiate between the Division 3 loads that are permanently connected and the auto-connected loads such as the diesel generator cooling water pump.	SR 3.8.1.11, SR 3.8.1.19	4.8.1.1.2.d.4, 4.8.1.1.2.d.6
M.2	A new requirement is added to the ITS for the Division 3 DG to maintain 550 gallons of fuel oil in the day tank.	SR 3.8.1.4	N/A
M.3	Not used.	N/A	N/A
M.4	When the common DG is removed from service for planned maintenance or testing, CTS 4.8.1.1.1.a (the offsite circuit check) is required to be performed within 48 hours prior to removal from service of the common DG. However, if the Surveillance is performed 48 hours prior to removal from service of the common DG, it is possible that the configuration of the offsite circuits may have changed by the time the DG is actually removed from service. Therefore, the ITS requires the offsite circuit check to be performed within 1 hour following removal of the diesel generator from service.	3.8.1 Required Action B.2	LCO 3.8.1.1.b footnote *
M.5	The CTS states that the provisions of Specification 3.0.4 are not applicable when the common DG is removed from service for planned maintenance or testing. The ITS does not provide this exception to ITS LCO 3.0.4. Elimination of this exception will require the inoperable DG to be restored to OPERABLE status prior to making a MODE change.	N/A	LCO 3.8.1.1.b footnote *
M.6	CTS 3.8.1.1 Action e requires the unit to be placed in Hot Shutdown (Mode 3) if one of the two inoperable offsite circuits is not restored to Operable status in 24 hours. ITS 3.8.1 ACTION G will require the unit to be placed in Mode 4 within 36 hours, in addition to being in Mode 3 within 12 hours.	3.8.1 ACTION G	3.8.1.1 Action e
M.7	When the opposite unit's Division 2 diesel generator is inoperable, CTS 3.8.1.1 Action g only requires a DG start verification or a verification that a common mode failure does not exist on the unit Division 2 diesel generator. ITS 3.8.1 ACTION C requires a DG start verification or a verification that a common mode failure does not exist on all required OPERABLE DGs.	3.8.1 ACTION C	3.8.1.1 Action g

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

M.8	Changes from 72 hours to 12 hours the time provided for one offsite circuit and the Division 3 DG to be inoperable concurrently.	3.8.1 ACTION E	3.8.1.1 Action h
M.9	Two Notes have been added representative of current LaSalle 1 and 2 practice (though more restrictive since the CTS does not have these restrictions): 1) SR 3.8.1.3 Note 3 precludes this Surveillance from being performed on more than one DG at a time, ensuring that an electrical disturbance during the DG test can only adversely affect one DG; and 2) SR 3.8.1.3 Note 4 requires that this SR be immediately preceded by a successful performance of SR 3.8.1.2 (the DG start Surveillance), ensuring the DG load carrying capability is tested subsequent to a successful DG start test.	SR 3.8.1.3 Notes 3 and 4	N/A
M.10	Adds limitations on the operating power factor for the 24-hour run. The actual power factor values have been added to the Bases. A Note has been also added to ensure a momentary transient that results in the power factor not being met does not invalidate the 24 hour run.	SR 3.8.1.14, including Notes 1 and 3	4.8.1.1.2.d.8
M.11	Requires the minimum voltage for the 10 year DG simultaneous start test to be ~~3744~~ 4010 V within 13 seconds; whereas the CTS does not provide a minimum voltage the DGs must attain within the 13 second DG start time assumed in the accident analysis.	SR 3.8.1.19, SR 3.8.1.20	4.8.1.1.2.d.7, 4.8.1.1.2.e
	For CTS 4.8.1.1.2.d.7, requires the steady state voltage to be 4160 ± 150 V vs. the current 4160 V ± 416 V. For CTS 4.8.1.1.2.e,		
	3.8.2, AC Sources - Shutdown		
M.1	Specifies that the offsite circuit required to be OPERABLE during shutdown conditions must be available to supply power to all equipment required to be OPERABLE in the current plant condition. Since the ITS 3.8.2 circuit OPERABILITY requirements are proposed to require them capable of supplying power to necessary electrical power distribution subsystems, if one or more subsystems are not capable of being powered via an offsite circuit, that circuit is inoperable. The CTS is not specific as to what the required circuit must be powering.	LCO 3.8.2.a	LCO 3.8.1.2.a
M.2	Requires the single Division 1 or Division 2 unit DG required OPERABLE during shutdown conditions to be associated with one or more systems, subsystems, or components required to be OPERABLE. The CTS is not specific as to what Division that DG must be associated with.	LCO 3.8.2.b	LCO 3.8.1.2.b
M.3	A new requirement is added to the ITS for the Division 3 DG to maintain 550 gallons of fuel oil in the day tank.	SR 3.8.1.4, SR 3.8.2.1	N/A

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M.4	When a required offsite circuit or a Division 1 or 2 unit DG is inoperable, the actions imposed by CTS 3.8.1.2 Action a do not necessarily place the unit in a MODE or other specified condition in which CTS LCO 3.8.1.2 is not applicable. Therefore, ITS 3.8.2 Required Actions A.2.4 and B.4 are being added, which implement a requirement to immediately initiate action to restore the required power sources to OPERABLE status.	3.8.2 Required Actions A.2.4 and B.4	N/A
	3.8.3, Diesel Fuel Oil and Starting Air		
M.1	A new Sureveillance has been added to check for and remove accumulated water from each required fuel oil storage tank every 92 days.	SR 3.8.3.4	N/A
	3.8.4, DC Sources - Operating		
M.1	CTS 4.7.3.d provides the Surveillance Requirements for the 250 VDC electrical power subsystem that supplies power to the RCIC System. The Applicability of CTS 3/4.7.3 is MODES 1, 2, and 3 with reactor steam dome pressure greater than 150 psig. The ITS present the 250 VDC electrical power subsystem in the same Specification as the 125 VDC electrical power subsystems. The ITS 3.8.4 Applicability covers all of MODES 1, 2, and 3, not just when the reactor steam dome pressure is greater than 150 psig, since the 250 VDC electrical power subsystem also provides power to a RCIC primary containment isolation valve (which is required by CTS 3.6.3 to be OPERABLE in MODES 1, 2, and 3).	3.8.4 Applicability	3/4.7.3 Applicability
M.2	Adds new SRs for the 250 VDC RCIC battery (verification that no visible corrosion at battery terminals and connections is present, resistance values for bolted battery connections, demonstration of charger capability, and battery service and modified performance/performance discharge tests) to ensure the 250V battery can perform its required function.	SR 3.8.4.2, SR 3.8.4.5, SR 3.8.4.6, SR 3.8.4.7, SR 3.8.4.8	N/A
M.3	Revises the 250 VDC battery limit to ≥ 256 volts, which is based on 2.20 volts/cell.	SR 3.8.4.1	4.7.3.d.1.d)
	3.8.5, DC Sources - Shutdown		

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

M.1	<INSERT M.1>	LCO 3.8.5~~, 3.8.5 Required Action B.1~~	LCO 3.8.2.4~~, 3.8.2.4 Action a~~

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INSERT M.1 (LCO 3.8.5 LaSalle)

The existing requirement of CTS 3.8.2.4 for "Division 1 or Division 2" DC electrical power sources to be OPERABLE during shutdown conditions is not specific as to what the single source must be powering. The requirement in ITS LCO 3.8.5 specifies that the source must be capable of supplying one division of the onsite Class 1E DC Electrical Power Distribution System required by LCO 3.8.8, "Distribution Systems - Shutdown." This added restriction conservatively assures that at least Division 1 or Division 2 DC electrical power distribution subsystem has an OPERABLE DC source (battery and associated charger) supplying it with power.

M.2	Not used. <INSERT M.2>	3.8.5 Required Action B.2.4	N/A
M.3	Provides new Required Actions for when the Division 3 DC source is inoperable, which require suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and OPDRVs.	3.8.5 Required Actions B.2.1, B.2.2, and B.2.3	3.8.2.4 Action b
M.4	With one DC electrical power source division (battery and/or battery charger) inoperable, CTS 3.8.2.4 Action c allows operation to continue for 72 hours as long as the associated 125V DC electrical power distribution subsystem is energized by the OPERABLE opposite unit DC electrical power subsystem. A Note has been added to CTS 3.8.2.4 Action c (ITS 3.8.5 Condition A) to not allow the actions to be taken when the opposite unit is in MODE 1, 2, or 3.	3.8.5 Condition A Note	3.8.2.4 Action c
M.5 <INSERT M.5>	In lieu of declaring the standing (by) gas treatment subsystem and control room and auxiliary electric equipment room emergency filtration subsystem inoperable and taking the Actions of the appropriate LCO as required by the CTS the ITS provides three new actions for when the opposite unit's Division 2 DC Source is inoperable. The ITS require immediate suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment and OPDRVs.	3.8.5 Required Actions B.2.1, B.2.2, and B.2.3	3.8.2.4 Action d
	3.8.6, Battery Cell Parameters		
M.1	Deletes allowance to correct the Category B float voltage limit for average electrolyte temperature based on IEEE-450, 1987 recommendations.	N/A	Table 4.8.2.3.2-1 footnote (c)
M.2	Imposes limitations that restrict the use of replacing specific gravity checks with charging current checks to 7 days when the battery is on float change following a battery charge only. ITS also requires an actual specific gravity measurement at the end of the 7 day allowance.	Table 3.8.6-1 footnote (c)	Table 4.8.2.3.2-1 footnote (b)
M.3	Adds a new requirement for when a Category A or B limit is not met requiring a check within 1 hour that the pilot cell electrolyte level and float voltage are within the Category C limits.	3.8.6 Required Action A.1	Table 4.8.2.3.2-1 footnotes (1) and (2)

INSERT M.2. (LCO 3.8.5 LaSalle)

In the event the necessary Division 1 or 2 DC source is not OPERABLE, ITS 3.8.5 Required Action B.2.4 is added to commence and continue attempts to restore necessary DC sources, resulting in an action that does not allow continued operation in the existing plant conditions. This has the effect of not allowing MODE changes per ITS LCO 3.0.4.

INSERT M.5 (LCO 3.8.5 LaSalle)

(which then, when one standby gas treatment subsystem or one control room auxiliary electric equipment room emergency filtration subsystem is inoperable, allows 7 days to restore the associated subsystems to OPERABLE status prior to suspending CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and OPDRVs),

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.8 - ELECTRICAL POWER SYSTEMS

M.4	New Surveillance Requirements have been added for the 250 VDC batter~~ies~~. ~~For the 250 VDC battery,~~ ITS SR 3.8.6.1 will require the individual pilot cell voltage to be checked every 7 days and ITS SR 3.8.6.2 will require all individual cell voltages to be checked every 92 days. In addition, ITS SR 3.8.6.3 requires the average electrolyte temperature of representative cells to be verified ~~$\geq$ 60°F for the 125V batteries, and~~ $\geq$ 65°F ~~for the 250V battery~~.	SR 3.8.6.1, SR 3.8.6.2, SR 3.8.6.3	N/A
M.5	Adds the following new limits for the 250 VDC battery: 1) new Category A and Category B limits for the 250 VDC battery that are applicable to each connected cell, including the pilot cell. These new limits will require the electrolyte level to be greater than the minimum level indication mark and less than or equal to 1/4 inch above the maximum level indication mark. These limits are modified by ITS Table 3.8.6-1 footnote (a), which allows the limits to be exceeded during and following an equalizing charge, provided it is not overflowing. If these new limits are exceeded, ITS 3.8.6 ACTION A will require the limits to be restored within 31 days, as well as ensuring the Category C limits continue to be met during this 31 day period. If not restored, ITS 3.8.6 ACTION B requires the associated DC electrical power subsystem to be immediately declared inoperable and the appropriate ACTIONS of ITS 3.8.4 taken (i.e., RCIC and the RCIC PCIV will be declared inoperable and the ACTIONS of the individual System Specifications taken). 2) Adds an additional Category C limit that the electrolyte level cannot be overflowing. If this Category C limit is exceeded, the battery will be declared inoperable immediately, consistent with the CTS. 3) Adds new Category B limit for all connected cells and a Category C limit for all connected cells, and provides a Category C limit for the deviation from the average for an individual cell. The limits are modified by two footnotes. ITS 3.8.6-1 footnotes (b) and (c) require the specific gravity to be corrected for electrolyte temperature and level, and allows a charging current requirement to substitute for the specific gravity requirement under certain conditions. When the Category C limit is not met, ITS 3.8.6 ACTION B requires the associated DC electrical power subsystem to be immediately declared inoperable and the appropriate ACTIONS of ITS 3.8.4 taken. When the Category B limit is exceeded, ITS 3.8.6 ACTION A will require the limits to be restored within 31 days, as well as ensuring the Category C limits continue to be met during this 31 day period. If not restored, ITS 3.8.6 ACTION B requires the associated DC electrical power subsystem to be immediately declared inoperable and the appropriate ACTIONS of ITS 3.8.4 taken.	3.8.6 ACTIONS A and B, Table 3.8.6-1 Category A, B, and C limits, including footnotes (a), (b), and (c)	N/A
M.6	Adds a requirement that the specific gravity be corrected for electrolyte level.	Table 3.8.6-1 footnote (b)	N/A

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3.8.7, Distribution Systems - Operating			
M.1	Establishes a maximum time allowed for any combination of distribution subsystems listed in ITS LCO 3.8.7.a to be inoperable during any single contiguous occurrence of failing to meet the LCO; i.e., "16 hours from discovery of failure to meet LCO 3.8.7.a." CTS does not provide this restriction.	3.8.7 ACTIONS A and B	N/A
M.2	Adds an action that requires entry into ITS 3.0.3 if the loss of two or more electrical power distribution subsystems, in combination, results in a loss of safety function. CTS does not provide this restriction when the loss of safety function is the result of a combination of inoperable AC and DC subsystems.	3.8.7 ACTION G	N/A
M.3	CTS 4.7.3.d provides the Surveillance Requirements for the 250 VDC electrical power subsystem that supplies power to the RCIC System. The Applicability of CTS 3/4.7.3 is MODES 1, 2, and 3 with reactor steam dome pressure greater than 150 psig. The ITS present the 250 VDC electrical power subsystem in the same Specification as the 125 VDC electrical power subsystems. The ITS 3.8.4 Applicability covers all of MODES 1, 2, and 3, not just when the reactor steam dome pressure is greater than 150 psig, since the 250 VDC electrical power subsystem also provides power to a RCIC primary containment isolation valve (which is required by CTS 3.6.3 to be OPERABLE in MODES 1, 2, and 3).	3.8.7 Applicability	3/4.7.3 Applicability
M.4	CTS 3.8.2.1 Action b requires that the HPCS System be declared inoperable when the Division 3 AC distribution system is inoperable. However, the HPCS System is not the only affected engineered safety feature supported by the Division 3 AC distribution system. Therefore, the associated ITS 3.8.7 Required Action will require that the "associated supported features" be declared inoperable. ~~This will include both the HPCS System and the associated primary containment isolation valves.~~ [This discussion indicates that the Div. 3 AC power source (and possibly DC power source) provides power to more than the HPCS system. If this is correct, then the Note in LCO 3.8.1 that allows the Div. 3 power sources to not be required when the HPCS is inoperable may not be acceptable for this plant design. Other part s of the TS may also be affected.]	3.8.7 ACTION E	3.8.2.1 Action b
3.8.8, Distribution Systems - Shutdown			

M.1	ITS 3.8.8 specifies that the distribution systems necessary to supply AC and DC power to all equipment required to be OPERABLE in the current plant condition must be OPERABLE. This added restriction conservatively assures the needed sources of power are OPERABLE; even if this results in both the Division 1 and Division 2 distribution subsystems being required. CTS 3.8.2.2 Actions a and 3.8.2.4 Action a have been modified to be "one or more required" instead of the current "both," to account for this potential addition. In addition, Required Action A.1, which requires the associated supported equipment to be declared inoperable, is added to ensure the appropriate actions are taken based on the equipment made inoperable by the loss of the distribution subsystem. Currently, this action only applies to the Division 3 equipment and the opposite unit Division 2 equipment.	LCO 3.8.8, 3.8.8 Required Action A.1	LCO 3.8.2.2, 3.8.2.2 Action a, LCO 3.8.2.4, 3.8.2.4 Action a
M.2	In the event the necessary Division 1, 2, or 3 electrical power distribution subsystems are not Operable, ITS 3.8.8 Required Action A.2.4 is added to commence and continue attempts to restore the necessary electrical power distribution subsystems, resulting in an action which does not allow continued operation in the existing plant condition. This has the effect of not allowing MODE changes per LCO 3.0.4. ITS 3.8.8 Required Action A.2.5 is also added for the Division 1 and 2 actions which assures the appropriate consideration is applied for shutdown cooling systems that are without required power, since additional actions not provided in the ITS 3.8.8 ACTIONS are required when shutdown cooling is inoperable.	3.8.8 Required Actions A.2.4 and A.2.5	N/A
M.3	New Required Actions have been provided for when the Division 3 AC or DC distribution subsystem is inoperable, requiring suspension of CORE ALTERATIONS, movement of irradiated fuel assemblies in the secondary containment, and OPDRVs	3.8.8 Required Actions A.2.1, A.2.2, and A.2.3	N/A
Current Specification 3/4.8.3.1, AC Circuits Inside Primary Containment			
NONE	NONE	NONE	NONE
Current Specification 3/4.8.3.2, Primary Containment Penetration Conductor Overcurrent Protective Devices			
NONE	NONE	NONE	NONE
Current Specification 3/4.8.3.3, Motor Operated Valves Thermal Overload Protection			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.9.1, Refueling Equipment Interlocks		
NONE	NONE	NONE	NONE
	3.9.2, Refuel Position One-Rod-Out Interlock		
NONE	NONE	NONE	NONE
	3.9.3, Control Rod Position		
NONE	NONE	NONE	NONE
	3.9.4, Control Rod Position Indication		
M.1	Changes the Applicability to MODE 5, regardless of whether or not a control rod is withdrawn. CTS 3.1.3.7 Action b for inoperable control rod position indication in MODE 5 only requires movement of the control rod to a position where it has an OPERABLE position indicator or to insert the control rod. The ITS ACTIONS require that fuel movement and control rod withdrawal be suspended and all insertable control rods in core cells containing fuel assemblies be fully inserted, or alternatively, that the control rod be fully inserted and disarmed. Also, a Completion Time has been added to specify that the Required Action be completed "immediately."	3.9.4, 3.9.4 ACTION A	3.1.3.7, 3.1.3.7 Action b
	3.9.5, Control Rod OPERABILITY - Refueling		

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TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
M.1	Adds a new requirement and associated ACTION and Surveillance Requirement for control rod OPERABILITY during refueling, i.e., each withdrawn control rod must be capable of insertion (by scram).	LCO 3.9.5, 3.9.5 ACTION A, SR 3.9.5.1	N/A
	3.9.6, RPV Water Level - Irradiated Fuel		
NONE	NONE	NONE	NONE
	3.9.7, RPV Water Level - New Fuel or Control Rods		
NONE	NONE	NONE	NONE
	3.9.8, Residual Heat Removal - High Water Level		
NONE	NONE	NONE	NONE
	3.9.9, Residual Heat Removal - Low Water Level		
M.1	Requires the following actions to be immediately initiated if an alternate method of decay heat removal is not verified: 1) restore secondary containment to OPERABLE status ; 2) restore one SGT subsystem to OPERABLE status; and 3) restore isolation capability in each required secondary containment penetration flowpath not isolated. These requirements will ensure the secondary containment boundary is intact to filter any release in the unlikely case the loss of shutdown cooling results in a release of fission products.	3.9.9 ACTION B	N/A
	Current Specification 3/4.9.4, Decay Time		

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SECTION 3.9 - REFUELING OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE
Current Specification 3/4.9.5, Communications			
NONE	NONE	NONE	NONE
Current Specification 3/4.9.6, Crane and Hoist			
NONE	NONE	NONE	NONE
Current Specification 3/4.9.7, Crane Travel			
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.1, Reactor Mode Switch Interlock Testing		
M.1	Adds an appropriate ACTION to identify the Required Actions and Completion Times for noncompliance with Special Operations ITS 3.10.1. Also, Surveillance Requirements are added to provide increased assurance of continued compliance with Special Operations ITS 3.10.1.	3.10.1 ACTION A, SR 3.10.1.1, SR 3.10.1.2	N/A
	3.10.2, Single Control Rod Withdrawal - Hot Shutdown		
M.1	Adds additional restrictions to ensure 1) an OPERABLE RPS SDV trip and an OPERABLE control rod, or to appropriately preclude the possibility of a local reactivity excursion; 2) the IRM, Reactor Mode Switch Shutdown Position, and Manual Scram RPS Functions of ITS 3.3.1.1; 3) the control rod position indication must be OPERABLE to support the one-rod-out interlock; and 4) all other control rods must be fully inserted. Furthermore, an ACTION and Surveillance Requirements are also provided in the proposed presentation for these allowances.	LCO 3.10.2 Item b, LCO 3.10.2 Item c, LCO 3.10.2 Item d.1, LCO 3.10.2 Item d.2,	N/A
	3.10.3, Single Control Rod Withdrawal - Cold Shutdown		
M.1	If CTS 3.9.10.1 is not met and the withdrawn control rod is insertable, two additional Required Actions are provided in ITS 3.10.3 ACTION A. ITS 3.10.3 Required Action A.2.1 requires action to be initiated immediately to fully insert all insertable control rods. ITS 3.10.3 Required Action A.2.2 requires the placing of the reactor mode switch to the Shutdown position, which will preclude withdrawal of any control rod. If CTS 3.9.10.1 is not met and the withdrawn control rod is not insertable, an additional Required Action, ITS 3.10.3 Required Action B.2.1, will require action to be initiated immediately to fully insert all control rods.	3.10.3 Required Actions A.2.1, A.2.2, and B.2.1	LCO 3.9.10.1
M.2	CTS provides an allowance to withdraw a single control rod while in MODE 4 provided the one-rod-out interlock is OPERABLE; however, the ITS applies an additional restriction to ensure the control rod position indication is OPERABLE (required to support the one-rod-out interlock).	LCO 3.10.3.b.1	N/A

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.4, Single Control Rod Drive Removal - Refueling		
M.1	Inputs to the one-rod-out interlock (rod position on the rod to be removed) must be overridden to remove the rod; thus, the one-rod-out interlock is not OPERABLE in this condition. To ensure only one rod is withdrawn, a new requirement that a control rod block is inserted has been added. This compensates for the inoperable one-rod-out interlock. To ensure no fuel is loaded (since refueling interlocks would preclude fuel movement with a withdrawn control rod), a new requirement that no other CORE ALTERATIONS can be in progress has been added. Surveillances have been added to verify a control rod withdrawal block is inserted every 24 hours and no other CORE ALTERATIONS are in progress every 24 hours.	LCO 3.10.4.c, LCO 3.10.4.d, SR 3.10.4.3, SR 3.10.4.5	N/A
	3.10.5, Multiple Control Rod Withdrawal - Refueling		
M.1	Adds a restriction on fuel assembly ~~movement~~ loading within the reactor pressure vessel with control rods withdrawn, consistent with existing conditions of the Operating Licenses. In addition, adds a new Surveillance Requirement to verify, every 24 hours, fuel assemblies are not being ~~moved~~ loaded within the reactor pressure vessel.	LCO 3.10.5.c, SR 3.10.5.3	N/A
	3.10.6, Control Rod Testing - Operating		
M.1	Deletes statement that allows this Special Test Exception to be used during the startup test program, since the Startup Test Program has been completed at LaSalle 1 and 2.	N/A	LCO 3.10.2.d
M.2	Deletes the flexibility to move control rods between 100% rod density and 75% rod density without verifying the movement is within the constraints of the established control rod pattern sequence when the RWM is bypassed.	N/A	4.10.2.b

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TABLE M - MORE RESTRICTIVE CHANGES MATRIX
SECTION 3.10 - SPECIAL OPERATIONS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	3.10.7, SDM Test - Refueling		
M.1	Adds a requirement to ensure adequate CRD charging water pressure is available. Also, adds an appropriate Surveillance Requirement.	LCO 3.10.7.f, SR 3.10.7.6	N/A
	Current Specification 3/4.10.1, Primary Containment Integrity		
M.1	Deletes Specification that provides an exception, during low power PHYSICS TESTS, to the requirement for maintaining Primary Containment Integrity.	N/A	3/4.10.1
	Current Specification 3/4.10.5, Oxygen Concentration		
M.1	Deletes Specification that provides an exception, during startup test program, to the requirement to maintain oxygen concentration within limits.	N/A	3/4.10.5
	Current Specification 3/4.10.6, Training Startups		
M.1	Deletes Specification that provides an exception, during startup test program, to the requirement to maintain oxygen concentration within limits.	N/A	3/4.10.5
	Current Specification 3/4.10.8, Suppression Chamber Water Temperature (Unit 1 only)		
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 4.0 - DESIGN FEATURES

DOC #	SUMMARY	ITS SECTION	CTS SECTION
NONE	NONE	NONE	NONE

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

DOC #	SUMMARY	ITS SECTION	CTS SECTION
	5.1, Responsibility		
M.1	Adds a requirement that the plant manager to delegate in writing the succession of the responsibility for overall plant operations during his absence.	5.1.1	N/A
	5.2, Organization		
M.1	Modifies the requirement that at least one required non-licensed operator be assigned to each unit when fuel is in the reactor vessel to requiring that the non-licensed operator be assigned to each unit at all times.	5.2.2.a	Figure 6.1-3 footnote (b)
	5.3, Unit Staff Qualifications		
NONE	NONE	NONE	NONE
	5.4, Procedures		
M.1	Adds requirement that all programs specified in Specification 5.5 have written procedures.	5.4.1.d	N/A
	5.5, Programs and Manuals		
M.1	Adds two new programs, the Technical Specification (TS) Bases Control Program and the Safety Function Determination Program (SFDP).	5.5.11, 5.5.12	N/A

M.2	Adds new requirements to: 1) verify either the API gravity or the absolute specific gravity of new fuel is within limits; 2) verify the new fuel oil flash point is within the requirements of the applicable ASTM standard; and 3) verify, within 31 days of adding new fuel to the storage tanks, that properties other than those specifically addressed are within limits for ASTM fuel.	5.5.10.a.1, 5.5.10.a.2, 5.5.10.b	N/A
5.6, Reporting Requirements			
NONE	NONE	NONE	NONE
5.7, High Radiation Area			
NONE	NONE	NONE	NONE
Current Specification 6.1.E/F, Training			
NONE	NONE	NONE	NONE
Current Specification 6.2.B, Radiation Protection Program			
NONE	NONE	NONE	NONE
Current Specification 6.3, Reportable Event Action			
NONE	NONE	NONE	NONE
Current Specification 6.4, Safety Limit Violation			

TABLE M - MORE RESTRICTIVE CHANGES MATRIX
CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

NONE	NONE	NONE	NONE
Current Specification 6.5, Plant Operating Records			
NONE	NONE	NONE	NONE
Current Specification 6.7, Process Control Program			
NONE	NONE	NONE	NONE
Current Specification 6.9, Major Changes to Radioactive Waste Treatment System			
NONE	NONE	NONE	NONE